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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JUAN CARLOS SERESI,
15 Defendant.

Case No. CR-89-190-SVW

**MOTION FOR COMPASSIONATE
RELEASE UNDER 18 U.S.C. §
3582(c)(1)(A); DECLARATION OF
COUNSEL; EXHIBITS.**

[Proposed] Order filed concurrently
herewith

17 Defendant Juan Carlos Seresi, by and through his appointed counsel of record,
18 Reuven L. Cohen, hereby moves this court pursuant to 18 U.S.C. § 3582(c)(1)(A) and the
19 First Step Act for a reduction in sentence to time served. This motion is based on the
20 attached memorandum of points and authorities, all files and records in this case, and such
21 further information as may be presented to the Court with respect to this motion.

23 Respectfully Submitted,
24 COHEN WILLIAMS LLP

25 Dated: September 14, 2020

By: /s/ Reuven L. Cohen
Reuven L. Cohen

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MEMORANDUM OF POINTS AND AUTHORITIES**I. INTRODUCTION**

Juan Carlos Seresi is a 73-year-old man who has served over 31 years of a 505-year sentence. During this time, he has made valiant efforts to become a better man. He has earned three associate's degrees, although he had little hope of ever putting his skills towards gainful employment. He has successfully completed approximately 85 educational and service-oriented courses, though doing so stood no chance of meaningfully reducing his time in custody. He has maintained a close and loving relationship with his children, and his many grandchildren, who have never known him outside a prison's walls. He has proven himself to be a kind and dedicated person, one who has pursued rehabilitation for its own sake – not a recalcitrant criminal incapable of change.

Mr. Seresi does not deserve to die in prison, and he need not. Compassionate release is amply justified in this case. Indeed, Mr. Seresi is clearly eligible for relief because he is over age 70 and has served more than 30 years of his sentence. Neither the government nor the Bureau of Prisons ("BOP") disagrees.

The sole questions before this Court, therefore, are whether Mr. Seresi poses a danger to his community, as set forth in 18 U.S.C. § 3142(g), and whether the § 3553(a) factors weigh in favor of release. *See* 18 U.S.C. § 3582(c)(1)(A). Simply put, Mr. Seresi poses no danger to anyone, and each factor favors a reduction in his sentence to time served. Mr. Seresi is a first-time, non-violent offender with an exemplary prison record, who has taken extraordinary steps to rehabilitate himself. He is also an elderly man who suffers from a host of medical conditions, which together make him particularly vulnerable to severe illness or death if infected with the COVID-19 virus, further reducing his already-negligible chance of recidivism. Moreover, the sheer length of the sentence served to date – the majority of Mr. Seresi's adult life – is sufficient to deter his future criminal conduct, and to send the strongest possible message of general deterrence. Finally, upon release, Mr. Seresi is fortunate to count upon the support of his family, who will open their home to

1 him. Each of these facts weighs heavily against a finding of dangerousness and in favor of
2 Mr. Seresi's compassionate release.

3 For these, and the reasons further detailed herein, Mr. Seresi respectfully requests
4 that the Court grant the instant motion, and reduce his sentence to time-served.

5 **II. PROCEDURAL HISTORY**

6 On August 21, 1991, Mr. Seresi was sentenced to 505 years in prison under the then-
7 mandatory Federal Sentencing Guidelines. On June 24, 2019, Mr. Seresi submitted a
8 request, pursuant to 18 U.S.C. § 3582(c)(1)(A) and Program Statement 5050.50, to the
9 Warden of the Los Angeles Metropolitan Detention Center for a recommendation that the
10 Bureau of Prisons ("BOP") file a motion for compassionate release on his behalf. *See*
11 Declaration of Reuven L. Cohen ("Cohen Decl.") at ¶ 2, Exhibit 1. On August 5, 2020,
12 more than a year later, the BOP denied Mr. Seresi's request. *See* Cohen Decl., ¶ 2, Exhibit
13 2. In a letter informing Mr. Seresi of that decision, the BOP's Office of General Counsel
14 stated that Mr. Seresi "meets the criteria for a reduction in sentence," but that he would not
15 be granted such a reduction because "doing so would minimize the severity of his criminal
16 conduct" and because Mr. Seresi is subject to an immigration detainer.¹ (*Id.*)

17 As Mr. Seresi's administrative remedies are now exhausted, pursuant to the First
18 Step Act, he brings his motion directly to the Court. *See* 18 U.S.C. § 3582(c)(1)(A)(i);
19 First Step Act of 2018, § 603(b), Pub. L. No. 115-391, 132 Stat. 5194, 5239 (2018).

20 **III. ARGUMENT**

21 The passage of the First Step Act in 2018 has broadened the scope of compassionate
22 release and returned sentencing power to the judiciary, "where it belongs." S. Rep. 98-225,
23 121, 1984 U.S.C.C.A.N. 3182, 3304. Because Mr. Seresi satisfies the statutory criteria for
24 relief, and all discretionary factors weigh in favor of release, the Court should grant his
25 motion forthwith.

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27
28 ¹ Mr. Seresi is a native and citizen of Argentina. He has chosen to pursue the instant motion
although he may face deportation upon release from BOP custody.

1 **A. Legal Standards.**

2 Prior to December 21, 2018, “the Court could only reduce a sentence of
3 imprisonment upon a motion of the Director of the Bureau of Prisons....” *United States v.*
4 *Esparza*, No. 1:07-cr-00294-BLW, 2020 WL 1696084, at *1 n.1 (D. Idaho Apr. 7, 2020).
5 But, on December 21, 2018, Congress enacted—and the President signed into law—the
6 First Step Act of 2018 (“the FSA”), “with the intent of ‘increasing the use and transparency
7 of compassionate release.’” *United States v. Willis*, 382 F. Supp. 3d 1185, 1187 (D.N.M.
8 2019). Accordingly, the FSA now “permits defendants to bring their own motions for
9 compassionate release after first exhausting their administrative remedies with the Bureau
10 of Prisons.” *United States v. Ayon-Nunez*, No. 1:16-cr-00130-DAD, 2020 WL 704785, at
11 *2 (E.D. Cal. Feb. 12, 2020). “Although relief under the statute is commonly referred to as
12 ‘compassionate release,’ such relief is not limited to immediate release, but includes a
13 reduction in sentence.” *United States v. Marks*, No. 03-cr-06033-L, — F.Supp.3d —, 2020 WL 1908911, at *3 n.3 (W.D.N.Y. Apr. 20, 2020).

15 “Compassionate release is governed by 18 U.S.C. § 3582(c).” *Willis*, 382 F. Supp.
16 3d at 1187. To qualify for a reduction in sentence, the petitioner must, as “a threshold
17 matter,” exhaust his administrative remedies. *United States v. Rodriguez*, 424 F. Supp. 3d
18 674, 680 (N.D. Cal. 2019). Following exhaustion, “[a] defendant may be eligible for
19 compassionate release: (1) if the Court finds ‘extraordinary or compelling reasons’ to
20 warrant a sentence reduction; *or* (2) if the defendant is at least 70 years old, has served at
21 least 30 years in prison pursuant to a sentence imposed for the offense for which the
22 defendant is currently imprisoned, and the defendant is determined not to pose a risk of
23 danger to the community.” *United States v. Gonzalez*, — F.Supp.3d —, 2020 WL
24 1536155, at *2 (E.D. Wa. 2020) (citing 18 U.S.C. § 3582(c)(1)(A)) (emphasis added).
25 “Under either eligibility prong, the Court must also find that a sentence reduction is
26 ‘consistent with applicable policy statements issued by the [United States] Sentencing
27 Commission.’” *Id.* (citing 18 U.S.C. § 3582(c)(1)(A)). “The Sentencing Guidelines,” in
28 turn, “instruct that the Court should consider the sentencing factors set forth in 18 U.S.C. §

3553(a) when deciding a motion for compassionate release, and that the Court should not grant a sentence reduction if the defendant poses a risk of danger to the community, as defined in the Bail Reform Act.” *Id.* (citing U.S.S.G. § 1B1.13).

As outlined below, each and every one of these requirements is met.

B. Mr. Seresi Merits Compassionate Release.

As discussed above, Mr. Seresi has fully exhausted his administrative remedies: he petitioned for compassionate release and the Bureau of Prisons’ Office of General Counsel in Washington D.C. denied that request. *See* Cohen Decl., ¶ 2, Exhibit 2. Mr. Seresi also clearly satisfies the statutory criteria for compassionate release set forth in § 3582(c) because he is more than 70 years old and has served more than 30 years of his sentence.² *Id.* The BOP agrees. *See id.*

It bears mentioning at the outset, moreover, that the BOP denied Mr. Seresi’s request for compassionate release in reliance upon inapposite criteria. The BOP did *not* find that Mr. Seresi’s release from custody would pose a danger to another person or to his community. Instead, the BOP relied upon Mr. Seresi’s undocumented immigration status, and its assessment that his release would “minimize the severity of the offense” *Id.* But, neither the inmate’s immigration status, nor whether release would “minimize” an offender’s misconduct is a factor for consideration under the statutory scheme. *See* 18 U.S.C. § 3582(c); 18 U.S.C. § 3553(a); U.S.S.G. § 1B1.13.

When this Court instead considers the legally relevant factors – namely, whether Mr. Seresi poses a danger to others, and whether the § 3553(a) factors weigh in favor of relief – Mr. Seresi’s release is amply justified.

² To the extent that the Court finds Mr. Seresi is not eligible under § 3582(c)(1)(A)(ii), he qualifies for compassionate release under § 3582(c)(1)(A)(i) because extraordinary and compelling reasons justify relief. Each of these reasons – namely, his advanced age and failing health, and his vulnerability to severe illness or death from COVID-19 – is discussed in detail herein.

1 **1. The nature and circumstances of Mr. Seresi's offense weigh in favor of**
 2 **relief.**

3 It is beyond dispute that the offense of conviction was Mr. Seresi's first, and that he
 4 has no history of violence and no criminal history. As discussed below, moreover, the
 5 record reflects that Mr. Seresi was a minor participant in the charged conspiracy and did
 6 not financially benefit from the scheme.

7 As the Court is well aware, the criminal conspiracy charged in *United States v.*
 8 *Andonian* (the "Andonian Conspiracy") was a vast, complex scheme that took place over a
 9 number of years. Compared to his co-defendants, the cooperating witnesses, and
 10 unindicted co-conspirators, Mr. Seresi was a minor player and was only involved for a
 11 short time.³ The Andonian Conspiracy began in 1985. (Presentence Report "PSR" at ¶
 12 34.) RAOF, a jewelry business owned by co-defendant Raul Vivas, was incorporated in
 13 1986. (PSR, ¶ 59.) Mr. Seresi was employed by RAOF as a bookkeeper from February
 14 1987 until December 1988. (PSR, ¶ 149.) He earned \$700 per week. (*Id.*) In his role as a
 15 bookkeeper, Mr. Seresi collected, counted, and recorded incoming and outgoing payments
 16 to and from RAOF and delivered gold. (PSR, ¶ 150.) After Raul Vivas left the country in
 17 late 1988, Mr. Seresi opened J.C. Jewelers and continued to collect and record payments as
 18 directed by Mr. Vivas and Mr. Iglesias.

19 At all times during the course of his employment, Mr. Seresi acted at the direction of
 20 his superiors, Raul Vivas and Tomas Iglesias. He had no underlings, managed no one, and
 21 had little, if any, authority to make independent decisions. (Sentencing Tr., Vol. 1, 94:4-
 22 95:2, 98:15-99:5.) In recognition of these facts, at sentencing, when the court structured
 23 the hearing pursuant to the case's "hierarchy of criminality," Mr. Seresi was second,
 24 meaning he was the *least* culpable of the four defendants that received 505-year sentences,
 25

26
 27 ³ With all due respect to the Court, Mr. Seresi maintains his contention, as detailed in his motion
 28 pursuant to 28 U.S.C. § 2255 (Dkts. 1275, 1277, and 1311-1), that *Brady* and 404(b) evidence was
 wrongly introduced against him, which clouds the evaluation of his culpability and role in the
 conspiracy.

1 and second least culpable in the entire Andonian Conspiracy. (Sentencing Tr., Vol. 1,
2 27:1-7.)

3 In addition, the record demonstrates that Mr. Seresi did not benefit financially from
4 the scheme. *See United States v. Andonian*, 29 F.3d 634, *11 (9th Cir. 1994) (noting that
5 Mr. Seresi “was not personally involved in handling all of the funds”) and Dkt. 1348-17 at
6 3 (noting that the record contains no evidence that Mr. Seresi was involved with, or could
7 have reasonably foreseen, shipments of proceeds from New York to Los Angeles).) In fact,
8 at sentencing, the court found him unable to pay a fine or the costs of imprisonment.
9 (Sentencing Tr., Vol. 2, 193:14-194:1) (noting that, “[Mr. Seresi], apparently, is a man of
10 rather modest means, and he has two [sic] young children and again a modest residence.”)

11 The nature and circumstances of Mr. Seresi’s offense – including its non-violent
12 nature, and Mr. Seresi’s comparatively minor role – thus weigh in favor of compassionate
13 release. *See United States v. Arreola-Bretado*, 445 F.Supp.3d 1154, 1154 (S.D. Cal. 2020)
14 (granting compassionate release to defendant convicted of importation of
15 methamphetamine and noting that the nature and circumstances of the offense weighed in
16 favor of relief because the defendant “is a nonviolent offender” and “[s]he has no prior
17 record”).

18 A recent decision from this district lends ample support for this conclusion. In
19 *United States v. Parker*, the court adjudicated a claim for compassionate release made by
20 an elderly inmate serving a life sentence, who stood convicted for his lead role in a massive
21 narcotics conspiracy wherein he and his fellow law enforcement officers executed false
22 “search warrants” upon drug stash houses and robbed drug dealers of cash, weapons, and
23 narcotics. — F.Supp.3d —, 2020 WL 2572525 (C.D. Cal 2020). The government
24 vehemently opposed compassionate release in light of the nature and circumstances of the
25 offense, noting, *inter alia*, that the defendant abused a position of trust, that the defendant
26 “was the ringleader of a significant drug conspiracy that had far-reaching effects,” and that
27 the defendant “had the capacity to, and was prepared to, engage in violent acts if necessary
28 to further his drug trafficking activity.” *Id.*, at *11. While the court agreed that the

defendant's offense conduct was undoubtedly "serious," the court noted that "'evidence of postsentencing rehabilitation may plainly be relevant'" and "'[s]everal courts have ... considered a defendant's rehabilitation in granting compassionate release.'" *Id.* (quoting *Pepper v. United States*, 562 U.S. 476, 491 (2011) and *United States v. Brown*, — F.Supp.3d —, —, 2020 WL 2091802, at *7 (S.D. Iowa Apr. 29, 2020)). The court therefore ultimately concluded that the nature and circumstances of the offense weighed in favor of compassionate release, in light of the defendant's laudable efforts at rehabilitation, which included earning two associate's degrees, completing numerous certificate programs, and holding several jobs. *Id.*

Mr. Seresi presents a case on all fours. During his term of incarceration, Mr. Seresi has earned three associate's degrees – in Social & Behavioral Sciences, in Arts & Humanities, and in American Studies – as well as a Legal Assistant/Paralegal Certificate. He has also successfully completed approximately 85 educational and service-oriented courses. *See* Cohen Decl., ¶ 4, Exhibit 3. Like in *Parker*, therefore, Mr. Seresi's laudable efforts at rehabilitation weigh in favor of compassionate release. *See id*; *see also United States v. Decator*, — F.Supp.3d —, —, 2020 WL 1676219, at *4 (D. Md. Apr. 6, 2020) (finding that § 3553(a)(1) factor favored compassionate release because, *inter alia*, "[w]hile incarcerated, Decator has participated in extensive education and rehabilitative programming; he has participated in over 1,500 hours of programming and has completed more than 70 courses"); *United States v. Redd*, — F.Supp.3d —, 2020 WL 1248493, at *10 (E.D. Va. Mar. 16, 2020) (finding that inmate's evidence of rehabilitation favored sentence reduction because inmate "has demonstrated a commitment to self-improvement, devoting hundreds of hours to vocational programs, assisting others in their rehabilitative efforts, exhibiting solid work habits, [and] caring for mental health inmates"); *United States v. Perez*, No. 88-cr-10094-JTM, 2020 WL 1180719, at *3 (D. Kan. Mar. 11, 2020) (finding that inmate's rehabilitation favored compassionate release where inmate "gained his GED while in prison and has availed himself of various educational programs.").

1 For all of these reasons, the nature and circumstances of Mr. Seresi's offense, when
 2 viewed in light of his substantial rehabilitative efforts, weigh in favor of relief.

3 **2. Mr. Seresi's history and characteristics weigh in favor of relief.**

4 **a. Mr. Seresi's age and health weigh in favor of relief.**

5 Mr. Seresi is both elderly and infirm. He suffers from several degenerative
 6 conditions, including high blood pressure, gout, arthritis, hearing loss, cataracts, and
 7 macular degeneration. *See* Cohen Decl., ¶ 3. His failing health alone weighs in favor of
 8 compassionate release. *See Parker*, 2020 WL 2572525 at *9 (noting that defendant's
 9 advanced age and "diabetes, arthritis, and hypertension" were considerations justifying
 10 compassionate release).

11 Moreover, Mr. Seresi faces additional, severe risk in light on the ongoing COVID-19
 12 pandemic. Indeed, the COVID-19 pandemic presents a dramatic and unprecedented threat
 13 to incarcerated individuals. The consensus among public health and legal experts is that
 14 prisons are uniquely ill-situated to handle the current pandemic.⁴

15 Experts' concerns are far from hypothetical. COVID-19 is now growing inside the
 16 Bureau of Prisons at a rate exponentially greater than among the population at large.
 17 7.68% of incarcerated individuals have been confirmed positive for COVID-19 compared
 18 to 1.49% of the U.S. population.⁵ The infection rate inside the BOP is 5.15 times higher
 19 than that of the United States.⁶ 114 federal inmates and 1 BOP staff member have died
 20 from the coronavirus.⁷ As the Honorable Judge Anita B. Brody simply and accurately put

22 ⁴ *See, e.g.,* P. Leila Barghouty, *The Outline*, *U.S. Prisons Are Not Ready for Coronavirus* (March
 23 6, 2020), at [https://theoutline.com/post/8770/prison-coronavirus-covid-19-](https://theoutline.com/post/8770/prison-coronavirus-covid-19-outbreak?zd=1&zi=oixu2i52)
 24 *outbreak?zd=1&zi=oixu2i52*; Martin Kaste, National Public Radio, *Prisons and Jails Worry*
 25 *About Becoming Coronavirus 'Incubators'* (March 13, 2020), at
 26 [https://www.npr.org/2020/03/13/815002735/prisons-and-jails-worry-aboutbecomingcoronavirus-](https://www.npr.org/2020/03/13/815002735/prisons-and-jails-worry-aboutbecomingcoronavirus-incubators)
 27 *incubators*; Achieving A Fair And Effective COVID-19 Response: An Open Letter to Vice-
 28 President Mike Pence, and Other Federal, State, and Local Leaders from Public Health and Legal
 Experts in the United States (last updated March 2, 2020), at
[https://law.yale.edu/sites/default/files/area/center/ghjp/documents/final_covid-](https://law.yale.edu/sites/default/files/area/center/ghjp/documents/final_covid-19_letter_from_public_health_and_legal_experts.pdf)
 19 *letter_from_public_health_and_legal_experts.pdf*.

⁵ *See* <https://federaldefendersny.org/>

⁶ *See id.*

⁷ *See* <https://www.bop.gov/coronavirus/>

1 it, “[p]risons are tinderboxes for infectious disease” and “are ill-equipped to prevent the
 2 spread of COVID-19.” *United States v. Rodriguez*, No. 2:03-CR-00271-AB-1, 2020 WL
 3 1627331, at *1, 7-8 (E.D. Pa. Apr. 1, 2020); *see also United States v. Gonzalez*, No. 2:18-
 4 CR-0232-TOR-15, 2020 WL 1536155 at *2 (E.D. Wash. Mar. 31, 2020)
 5 (“Because it is impossible to practice social distancing or isolation in a jail setting, the
 6 pandemic will be devastating when it reaches jail populations.”).⁸

7 While COVID-19 poses great risk to all incarcerated people, Mr. Seresi is *uniquely*
 8 vulnerable to severe illness and death from COVID-19 due to his age and poor health. 80%
 9 of those who die from coronavirus are over 65, and as many as 15% of older adults infected
 10 will die.⁹ Additionally, “[t]he latest evidence shows that people with uncontrolled ... high
 11 blood pressure may be at risk of getting severely ill with COVID-19.”¹⁰ Mr. Seresi’s age
 12 and health combined thus make his risk of succumbing to the coronavirus all the more real,
 13 and dire.

14 Accordingly, the inescapable conclusion that the court reached in *Rodriguez* applies
 15 equally here: “The BOP cannot adequately protect Mr. [Seresi] from infection, especially in
 16 light of his vulnerability” to the deadly virus. *Rodriguez*, 2020 WL 1627331, at *9. This
 17 Court has the authority to prevent Mr. Seresi from becoming another statistic and should
 18 exercise that authority here.

19 Mr. Seresi’s age and health thus weigh in favor of compassionate release.

20 //

21
 22
 23 ⁸ While the statistics discussed above are staggering in their own right, it is important to put them
 24 into perspective and remember the human cost of incarceration during a pandemic. Take, for
 25 example, the tragic case of Reginald Waddell. Mr. Waddell died from COVID-19 complications
 26 the night before his motion for compassionate release was granted. *See United States v. Waddell*,
 27 No. 1:09-cr-00435-LO, Dkt. 122, (E.D. Va. Aug. 4, 2020). Mr. Waddell was forced to wait 30
 28 days to exhaust his administrative remedies and an additional 14 days in quarantine. Due to these
 procedural delays, Mr. Waddell died in custody, alone, instead of with his loving family, despite
 all parties’ agreement that release was warranted.

⁹ *See* <https://www.businessinsider.com/most-us-coronavirus-deaths-ages-65-older-cdc-report-2020-3>.

¹⁰ *See* <https://www.mayoclinic.org/diseases-conditions/coronavirus/expert-answers/coronavirus-high-blood-pressure/faq->

b. Mr. Seresi's characteristics weigh in favor of relief.

As noted above, Mr. Seresi has been an exemplary inmate throughout his imprisonment. He has received a single, uncontested disciplinary action during his 30 years of incarceration.¹¹ This is in spite of the fact that he spent the first 20 years of his incarceration in maximum security facilities – 15 years in Lompoc and 5 years in Atwater, two of the most violent facilities in the country at the time. He considers his stellar record attributable to his commitment to avoid confrontations, fights, inmate politics, drinking, gambling, drugs, and gangs.

Mr. Seresi has spent his years of incarceration learning and reading as much as possible, and helping others achieve their educational goals. As discussed, he has earned three associate's degrees and a paralegal certificate while incarcerated, and has successfully completed approximately 85 educational and service-oriented courses. *See* Cohen Decl., ¶ 4, Exhibit 3.

Mr. Seresi's family knows him to be a gentle, kind, and caring person. He is loved by his wife, Maria, his grown children, Patricia, Cristina, and Ricardo, his ten grandchildren and step-grandchildren: Shawn (24), Valerie (23), Tristan (14), Giancarlo (10), Nicolas (7), twins Miranda and Liliana (5), Lucas (5), Guilian (3), and Giovanni (1), his sister and his nieces and nephews. Prior to MDC's cancellation of visitation, his family visited him every Tuesday and they speak nearly daily on the phone. *See* Cohen Decl., ¶5. His family has stood with him throughout his incarceration and will remain devoted to him if he is released.

His daughter Patti describes him as an "exceptional" and "unique" person who always learns from his mistakes and constantly strives to become a better person. *See* Cohen Decl., Exhibit 4. Despite his lengthy incarceration, he has maintained a positive

20487663#:~:text=Health%20risks%20linked%20to%20high,severely%20ill%20with%20COVID%2D19%20.

¹¹ *See* Cohen Decl., ¶4, Exhibit 1 at Exhibit A, Discipline Hearing Officer Report. Mr. Seresi's single disciplinary incident involved putting a nominal amount of money on another inmate's books. It was wholly non-violent and Mr. Seresi readily admitted his mistake.

1 outlook and teaches his children to always look for the positive. *Id.* He has remained
 2 committed to broadening his mind and has taken advantage of every opportunity to take
 3 classes and to learn while incarcerated. *Id.*

4 Mr. Seresi's characteristics, including his strong family ties, certainly weigh in favor
 5 of relief. *See United States v. Mondaca*, 2020 WL 1029024, at *4 (S.D. Cal. Mar. 3, 2020)
 6 (noting that many courts have determined that the history and characteristics factor weighs
 7 in favor of a sentence reduction where an inmate "has numerous family ties, including
 8 family members who will provide for him.").

9 **3. The balance of the § 3553(a) factors weigh in favor of relief.**

10 **a. Mr. Seresi's significant term of incarceration satisfies the sentencing**
 11 **goals of deterrence.**

12 Mr. Seresi has served the majority of his adult life in prison. This alone has
 13 sufficiently deterred him from engaging in future criminal conduct—which, given his lack
 14 of criminal history and non-violent nature, was unlikely to begin with—and satisfies the
 15 need for specific deterrence. Further, his exemplary prison record and the educational and
 16 vocational training he has undertaken—knowing he had a near nonexistent chance of
 17 release—further demonstrate that Mr. Seresi has been adequately deterred from future
 18 criminal conduct.

19 As for general deterrence, a 30+ year sentence sends a strong message to would-be
 20 offenders that the United States will prosecute money laundering offenses to the fullest
 21 extent of the law, and that such crimes will carry harsh penalties.

22 Thus, the more than 31 years Mr. Seresi has served sufficiently reflects the
 23 seriousness of the offense, the need for deterrence, and promotes respect for the law.
 24 Further incarceration is unnecessary to satisfy these goals. *See Parker*, 2020 WL 2572525
 25 at *12 ("While Parker's underlying criminal offenses are undeniably serious, Parker has
 26 already served nearly 22 years in prison, which 'has consumed a large part of his life and
 27 by any measure represents a very substantial punishment that reflects the seriousness of his
 28 offenses and the need for general or specific deterrence' and 'is also a period of time that

promotes respect for the law and provides just punishment for his offenses.’’’) (quoting *Redd*, 2020 WL 1248493 at *8).

b. Release will best provide Mr. Seresi with necessary medical care.

As discussed above, further incarceration presents a grave risk to Mr. Seresi’s health in light of the COVID-19 pandemic. Mr. Seresi cannot practice social distancing, the sole means of protecting oneself from infection, within a custodial environment. The risk to his life, should he become infected, cannot be overstated. Thus, release, not further incarceration, is the best means to protect Mr. Seresi’s health and provide him with needed medical care. Moreover, given Mr. Seresi’s “extensive use of prison programming, the only thing left ‘to provide the defendant with needed education or vocational training’ is to pursue an actual vocation.” *Brown*, 2020 WL 2091802 at *10 (citing U.S.C. § 3553(a)(2)(D)).

This factor too, therefore, weighs in favor of release.

c. The need to avoid unwarranted sentencing disparities weighs in favor of Mr. Seresi’s early release.

If sentenced today, Mr. Seresi would likely receive a variance below the Guidelines range to avoid unwarranted sentencing disparities among similarly-situated defendants, as well as to avoid unwarranted similarities among dissimilarly-situated defendants. *See* 18 U.S.C. § 3553(a)(6); *Gall v. United States*, 552 U.S. 38, 55 (2007).

As the Court is aware, the government divided the conspiracy with which Mr. Seresi was charged into two parts—the Andonian case, No. 2:89-cr-190-WDK, before Judge Keller, in which he was charged, and the Koyomejian case, No. 2:89-cr-189-CBM, before Judge Marshall. According to Assistant United States Attorney Richard G. Rathmann, who prosecuted the Koyomejian case, “the level of sophistication in the Koyomejian case, in many respects, dwarfed the Andonian case.” *See* Weinstein, Henry, “Eight Plead Guilty to Money Laundering Counts.” *Los Angeles Times*, Oct. 2, 1993. Yet, the defendants in the Koyomejian case received significantly lower sentences than Mr. Seresi did, ranging from 0 to 23 years with the possibility of reduction for cooperation, despite being convicted of

1 the *same conduct*. The *lead* defendant in the Koyomejian case was released over ten years
2 ago, in January 2007.

3 Mr. Seresi, of course, was not the lead defendant in the Andonian case. He was the
4 seventeenth charged, reflecting his low-level role. (Sentencing Tr., Vol. 1, 27:1-7.)
5 Moreover, as noted, the sentencing court deemed him to be the second least culpable
6 overall, and the least culpable of the four defendants to receive 505-year sentences. His
7 early release, therefore, would eliminate the unwarranted sentencing disparity that currently
8 exists between him and the Koyomejian defendants. *See Parker*, 2020 WL 2572525 at *13
9 (“‘[T]he need to avoid unwarranted sentence disparities among defendants with similar
10 records who have been found guilty of similar conduct’ also cuts in favor of release.”
11 While Parker received a life sentence, Ruelas, Parker’s co-conspirator and half-brother,
12 ultimately received a reduced sentence of 228 months. Similarly, after agreeing to plead
13 guilty, Wilcox and Strickler, the other members of the [conspiracy], received sentences of
14 63 months and 24 months, respectively.”) (quoting 18 U.S.C. § 3553(a)(6)).

15 **d. Post-Booker, Mr. Seresi would face a significantly less severe**
16 **sentence.**

17 “Courts have specifically recognized the significance of *Booker* where, pursuant to
18 other provisions of the FSA, inmates have sought reductions of sentences imposed prior to
19 *Booker*.¹² *Parker*, 2020 WL 2572525 at *10; *see also Jones v. United States*, 431
20 F.Supp.3d 740, 747 (E.D. Va. 2020) (“The retroactive nature of the [FSA] provides long-
21 awaited relief to those sentenced under the unconstitutionally imposed mandatory guideline
22 ranges.”); *accord United States v. Stanback*, 377 F. Supp. 3d 618, 625 (W.D. Va. 2019)
23 (“The court finds that it has authority under 18 U.S.C. § 3582(c)(2) to modify Stanback’s
24 sentence, taking into account the advisory nature of the guidelines after *Booker* and the
25 considerations set forth in 18 U.S.C. § 3553(a).”).

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28 ¹² *United States v. Booker*, 543 U.S. 220 (2005).

1 Post-*Booker*, there is little question that Mr. Seresi would face a much less severe
 2 sentence. From October 1, 2018 through September 30, 2019, judges have sentenced
 3 below the Guidelines range in 59.2% of all money laundering cases. *See* U.S. Sent’g
 4 Comm’n Quarterly Data Report, 4th Quarter Release, Preliminary Fiscal Year 2019 Data
 5 through September 30, 2019, at p. 17 (Table 10). The average extent of downward
 6 variance is 48.4%. *Id.* at p. 27 (Table 18). If Mr. Seresi were to receive the median
 7 percentage decrease of 50%, his life sentence – which the Sentencing Commission
 8 calculates as 470 months – would be reduced to 227 months. Mr. Seresi has already served
 9 31 years, over 12 years longer than his likely sentence.¹³

10 Moreover, though the Andonian conspiracy was massive, today, it is not
 11 unprecedented. Over the last several years, many high-profile defendants whose crimes
 12 dwarf the conduct at issue were sentenced to significantly less time than Mr. Seresi. To
 13 name the most obvious example, Bernie Madoff, the architect of “the largest, longest, and
 14 most widespread Ponzi scheme in history,” responsible for defrauding his investors of \$65
 15 billion, was sentenced to 150 years in prison¹⁴ – which is less than 30% of Mr. Seresi’s
 16 sentence. Likewise, Arthur Budovsky, the most culpable defendant in a case described by
 17 the government as “perhaps the biggest money laundering scheme in U.S. history”¹⁵ -
 18 involving an underground hub used to launder \$6 billion in money tied to credit card fraud,
 19 identity theft, investment fraud, computer hacking, child pornography, and drug trafficking
 20 – was sentenced to 20 years.¹⁶ And Andrew Caspersen, the Wall Street scion who stole
 21 \$40 million from his friends and family, was sentenced to 4 years.¹⁷

24 ¹³ The average sentence for money laundering is 5 years, with a median sentence of 2.75 years. *Id.*
 25 at p. 9 (Table 6).

26 ¹⁴ Henriques, Diana B., “Madoff is Sentenced to 150 Years for Ponzi Scheme,” N.Y. Times, June
 29, 2009.

27 ¹⁵ Hays, Tom, “7 Charged in \$6B Money Laundering Case,” A.P., May 28, 2013.

28 ¹⁶ Pagliery, Jose, “Creator of Online Money Liberty Reserve gets 20 Years in Prison,” CNN
 Money, May 6, 2016.

¹⁷ Goldstein, Matthew, “Wall St. Scion gets 4 Years in Prison for Fraud,” N.Y. Times, November
 4, 2016.

1 Thus, post-*Booker*, Mr. Seresi likely would receive a significantly less severe
2 sentence. This factor too weighs in favor of compassionate release.

3 **4. Mr. Seresi poses no danger to his community.**

4 Prior to his incarceration, Mr. Seresi had no history of violence. His prison record
5 belies any notion that he poses a danger to his community.

6 At sentencing, not only was Mr. Seresi in Criminal History Category I, he had no
7 prior convictions whatsoever, other than minor vehicle code infractions. (PSR ¶¶ 125-129.)
8 Indeed, his offense conduct was, by any measure, an aberration in an otherwise law-abiding
9 life. He was then a married 44-year-old with job skills, no history of drug use, and no
10 criminal record, placing him among the offenders least likely to recidivate in the entire
11 criminal justice system. His advanced age now puts him squarely in that category.¹⁸

12 Mr. Seresi, moreover, has been an exemplary inmate throughout his imprisonment.
13 As discussed above, he has taken advantage of every rehabilitative opportunity afforded to
14 him, simply for the sake of self-improvement. He has received a single, uncontested
15 disciplinary action during his 30 years of incarceration, in spite of the fact that he spent the
16 first 20 years of his incarceration in notoriously-violent maximum security facilities.

17 Plainly, Mr. Seresi is not a danger.¹⁹ To the extent that the Court harbors doubts in
18 this regard, however – though, emphatically, it need not – those concerns are “significantly
19 addressed by the fact that when the Court sentenced [Mr. Seresi], the Court ordered that
20 ‘[i]f released from imprisonment, [Seresi] shall be placed on supervised release for a term
21 of [three] years.’” See Exhibit A (Judgment and Commitment Order). In other words, any
22 danger that Mr. Seresi conceivably poses to his community is adequately mitigated by the
23 term of supervised release he will begin serving upon his release from incarceration, which
24 will assure that, should he stray from a law-abiding path, the Court retains the power to
25 return him to custody. See *Parker*, 2020 WL 2572525 at *13; see also *Marks*, 2020 WL

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28 ¹⁸ See United States Sentencing Commission, *The Effects of Aging on Recidivism Among Federal Offenders* (Dec. 2017).

1 1908911 at *15 (finding that any risk of danger associated with a reduction in sentence
 2 “can be further mitigated by supervised release.”); *United States v. Williams*, 2020 WL
 3 1751545, at *3 (N.D. Fla. Apr. 1, 2020) (noting, with respect to inmate’s motion for
 4 compassionate release, that while “the Court cannot conclude ... that he poses no risk at all
 5 to public safety ... the risk of him engaging in further criminal conduct is minimal and can
 6 be managed through ... the terms of his supervised release.”); *see also Mondaca*, 2020 WL
 7 1029024 at *4 (noting that inmate’s compassionate release posed minimal danger because
 8 inmate “will be supervised by the Probation Department upon his release from custody
 9 through a five year term of supervised release”).

10 For all of these reasons, Mr. Seresi poses no threat of recidivism or danger to society,
 11 and this factor too weighs in favor of compassionate release.

12 **C. Mr. Seresi has a well-established release plan.**

13 Finally, Mr. Seresi has a well-established release plan that will provide him with care
 14 and stability following his release from incarceration.²⁰

15 Upon release, Mr. Seresi would move in with his daughter, Patricia, and her family
 16 in Santa Clarita. *See* Cohen Decl., ¶ 6; Exhibit 4. Patricia is a state-certified Spanish-
 17 language interpreter and a valued member of the Los Angeles Superior Court family,
 18 having served the community in that role for 18 years.

19 In addition to Patricia, Mr. Seresi has significant family ties in the Los Angeles area,
 20 including his wife, his sister and her children, and his two other children, Cristina and
 21 Ricardo. His entire family lives nearby and will be a constant source of support. *See*
 22 Cohen Decl., Exhibit 5. Due to the support of his adult children, all of whom have
 23 successful careers and stable families of their own, he will have fewer challenges when
 24 reentering society than he might otherwise face. He will be able to work with his son,
 25 Ricardo, at his electronics repair store. *See* Cohen Decl., Exhibit 5. Should this prove to be
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 28 ¹⁹ Should Mr. Seresi face deportation upon his release from BOP custody, plainly he will pose no
 danger to his community.

1 too much for him in light of his failing health, his children will support him financially, and
 2 in return, he will help them by providing childcare for his grandchildren. *Id.* He is very
 3 much looking forward to making up for lost time with them.

4 **IV. CONCLUSION**

5 As the foregoing discussion reveals, Mr. Seresi is eligible for compassionate release,
 6 all discretionary factors weigh in his favor, and relief is amply justified. The Court should
 7 therefore reduce Mr. Seresi's sentence to time-served, modify the terms of supervised
 8 release to accommodate his release plan, and release him from custody forthwith.

9
 10 Respectfully Submitted,
 11 COHEN WILLIAMS LLP

12 Dated: September 14, 2020

By: /s/ Reuven L. Cohen
 Reuven L. Cohen
 Attorneys for Defendant
 JUAN CARLOS SERESI

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 28 ²⁰ Should Mr. Seresi face deportation upon his release from BOP custody, he will be deported to
 Argentina where he will enjoy the support of his nephew. *See* Cohen Decl., ¶ 7.

EXHIBIT A

UNITED STATES OF AMERICA vs.

Defendant's Name **JUAN CARLOS SERESI**

& Residence **4000 Badger Ave.
Sylmar, CA 91342**

Address

Docket No. **CR - 89-190(D)-WDK**

Social Security No. **548-98-9060**

Mailing Address **same as residence**

JUDGMENT AND PROBATION / COMMITMENT ORDER

In the presence of the attorney for the government, the defendant appeared in person on this date.

MONTH DAY YEAR
August 21, 1991

COUNSEL

☐ WITHOUT COUNSEL

However, the Court advised defendant of right to counsel and asked whether defendant desired to have counsel appointed by the Court and the defendant thereupon waived assistance of counsel.

☒ WITH COUNSEL

Edward Masry, retained

(Name of Counsel)

PLEA

☐ GUILTY, and the Court being satisfied that there is a factual basis for the plea

NOLO CONTENDERE

☒ NOT GUILTY

FINDING

There being a **guilty** verdict of ☒ GUILTY, defendant has been convicted as charged of the offense(s) of:

Conspiracy to Launder Money, in violation of 18 USC 371; 1956, as charged in Count 2 of the First Superseding Indictment; Aid and Abet Money Laundering, in violation of 18 USC 2, 1956(a)(1), as charged in Counts 3-27 of the First Superseding Indictment.

JUDGMENT
AND PROB./
COMMITMENT
ORDER

The Court asked whether defendant had anything to say why judgment should not be pronounced. Because no sufficient cause to the contrary was shown, or appeared to the Court, the Court adjudged the defendant guilty as charged and convicted and ordered that: Pursuant to the Sentencing Reform Act of 1984, it is the judgment of the Court that the defendant is hereby committed to the custody of the Bureau of Prisons to be imprisoned for a term of: **505 years. This term consists of 5 years**

on Count 2 and 20 years on Counts 3 through 27, all terms to be served consecutively. If the defendant is released from imprisonment, the defendant shall be placed on supervised release for a term of three years. This term consists of 3 years on each of Counts 2 through 27, all such terms to run concurrently under the following terms and conditions: 1) defendant shall comply with the rules and regulations of the U. S. Probation Office and General Order 318. Pursuant to Section 5E1.2(f)(2) of the Guidelines, all fines are waived, including the costs of imprisonment and supervision. It is ordered that the defendant shall pay a special assessment in the amount of \$1,300 to the United States.

In addition to the special conditions of supervision imposed above, it is hereby ordered that the Standard Conditions of Probation and Supervised Release set out on the reverse side of this judgment be imposed. The Court may change the conditions of supervision, reduce or extend the period of supervision, and at any time during the supervision period or within the maximum period permitted by law, may issue a warrant and revoke supervision for a violation occurring during the supervision period.

☐ This is a direct commitment to the Bureau of Prisons, and the Court has NO OBJECTION should the Bureau of Prisons designate defendant to a Community Corrections Center.

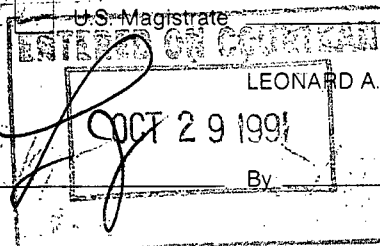
Signed By: ☒ U.S. District Judge

WILLIAM D. KELLER

U.S. Magistrate

It is ordered that the Clerk deliver a certified copy of this Judgment and Probation / Commitment Order to the U.S. Marshal or other qualified officer.

Dated / Filed



Deputy Clerk

STANDARD CONDITIONS OF PROBATION AND SUPERVISED RELEASE

While the defendant is on probation or supervised release pursuant to this Judgment:

1. The defendant shall not commit another Federal, state or local crime;
2. the defendant shall not leave the judicial district without the written permission of the court or probation officer;
3. the defendant shall report to the probation officer as directed by the court or probation officer and shall submit a truthful and complete written report within the first five days of each month;
4. the defendant shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer;
5. the defendant shall support his or her dependents and meet other family responsibilities;
6. the defendant shall work regularly at a lawful occupation unless excused by the probation officer for schooling, training, or other acceptable reasons;
7. the defendant shall notify the probation officer within 72 hours of any change in residence or employment;
8. the defendant shall refrain from excessive use of alcohol and shall not purchase, possess, use, distribute, or administer any narcotic or other controlled substance, or any paraphernalia related to such substances, except as prescribed by a physician;
9. the defendant shall not frequent places where controlled substances are illegally sold, used, distributed or administered;
10. the defendant shall not associate with any persons engaged in criminal activity, and shall not associate with any person convicted of a felony unless granted permission to do so by the probation officer;
11. the defendant shall permit a probation officer to visit him or her at any time at home or elsewhere and shall permit confiscation of any contraband observed in plain view by the probation officer;
12. the defendant shall notify the probation officer within 72 hours of being arrested or questioned by a law enforcement officer;
13. the defendant shall not enter into any agreement to act as an informer or a special agent of a law enforcement agency without the permission of the court;
14. as directed by the probation officer, the defendant shall notify third parties of risks that may be occasioned by the defendant's criminal record or personal history or characteristics, and shall permit the probation officer to make such notifications and to conform the defendant's compliance with such notification requirement;
15. the defendant shall not possess a firearm or other dangerous weapon;
16. the defendant shall, upon release from any period of custody, report to the probation officer within 72 hours

These conditions are in addition to any other conditions imposed by this Judgment.

RETURN

I have executed the within Judgment and Commitment as follows:

Defendant delivered on _____ to _____

Defendant noted appeal on _____

Defendant released on _____

Mandate issued on _____

Defendant's appeal determined on _____

Defendant delivered on 09-12-1991 to U.S. PENITENTIARY

at LOMPOC, CALIFORNIA, the institution designated by the Bureau of Prisons, with a certified copy of the within Judgment and Commitment.

UNITED STATES MARSHAL

DATED: Sept 12, 1991

BY: 

CERTIFICATE

I hereby attest and certify this date that the foregoing document is a full, true and correct copy of the original on file in my office, and in my legal custody.

CLERK, U.S. DISTRICT COURT

DATED 8/27/91

BY: 

DECLARATION OF REUVEN L. COHEN

I, Reuven L. Cohen, declare:

1. I am appointed counsel for Juan Carlos Seresi. I am licensed to practice law in the State of California and I am admitted to practice in this Court. I am submitting this declaration in support of Mr. Seresi's Motion for Compassionate Release.

2. In May 2019, Mr. Seresi submitted a request, pursuant to 18 U.S.C. § 3582(c)(1)(A), to the Warden of Los Angeles Metropolitan Detention Center for a recommendation that the Bureau of Prisons ("BOP") file a motion for compassionate release on his behalf. The BOP gave him an official submission date on June 24, 2019. A true and correct copy of his request is attached hereto as Exhibit 1. On August 5, 2020, the BOP denied Mr. Seresi's request. Attached hereto as Exhibit 2 is a true and correct copy of the BOP's letter.

3. Mr. Seresi suffers from the following medical conditions: high blood pressure, gout, arthritis, obesity, macular degeneration affecting his vision, cataracts, and hearing loss.

4. Mr. Seresi is not a danger to the community. He has no history of violence and is not a threat to recidivate. While incarcerated, Mr. Seresi has earned three associates degrees and a Legal Assistant/Paralegal certificate, as well as completed approximately 85 educational and service-oriented courses, true and correct copies of which are attached hereto as Exhibit 3. His prison record is exemplary, with only one disciplinary action in 31 years. The report is attached hereto as Exhibit A to Exhibit 1.

5. Mr. Seresi is a married man with three grown children and ten grandchildren and step-grandchildren. Prior to MDC's lockdown, his family visited him every Tuesday and they speak nearly daily on the phone.

6. Upon release, Mr. Seresi will reside with his daughter, Patricia Mawer, and her family in Santa Clarita. Attached hereto as Exhibit 4 is a letter of support from Ms. Mawer. Mr. Seresi will have significant familial support from his extended family

1 in the Los Angeles area. His children will support him financially. In return, he will
2 provide child care for his grandchildren. Attached hereto as Exhibit 5 are letters of
3 support from his family and friends.

4 7. Should Mr. Seresi be deported to Argentina, he will be supported by his
5 nephew in Argentina. His extended family will support him from Los Angeles.

6 I declare under penalty of perjury under the laws of the United States of America
7 that the foregoing is true and correct.

8 Executed on September 14, 2020, at Los Angeles, California.

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10 /s/ Reuven L. Cohen
11 Reuven L. Cohen
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EXHIBIT 1

JUAN CARLOS SERESI
Register No. 90574-012
Metropolitan Detention Center-Los Angeles
535 Alameda Street
Los Angeles, CA 90012

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS SERESI,

Defendant.

Case No. CR-89-190-SVW

**REQUEST FOR
RECOMMENDATION FOR
COMPASSIONATE RELEASE
UNDER 18 U.S.C. § 3582(c)(1)(A)**

I, Juan Carlos Seresi, Register Number 90574-012, hereby request that the Warden, or relevant administrator, at Los Angeles Metropolitan Detention Center, recommend that the Bureau of Prisons (“BOP”) file a motion with the United States District Court that I be granted compassionate release. This request is made pursuant to 18 U.S.C. § 3582(c)(1)(A) and is based on the attached Memorandum of Points and Authorities.

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

My name is Juan Carlos Seresi. I am 71 years old. I have served 30 years of a 505-year sentence for money laundering. During my incarceration, I have earned three associates degrees and, as set forth herein, have a nearly unblemished administrative record with no history of violence. Prior to my incarceration, I had no history of violence before or during my incarceration.

My half-millennium sentence is unprecedented and unwarranted. Others convicted of money laundering today face sentences of 3-5 years on average. The most culpable co-conspirators sentenced for the *same conduct* by U.S. District Judge Consuelo Marshall in the companion case to my own received drastically lower sentences, and were all released a decade ago (or earlier).

I have raised three incredible children - including a treasured member of the Los Angeles court family - and have exceptional family support. My children were still at home at the time of my sentencing. I have maintained relationships with them throughout my incarceration. They have since grown into exceptional adults with families of their own, including my ten grandchildren and step-grandchildren, with whom I have built strong relationships despite the fact that they were all born while I have been incarcerated. My family will stand by me upon release and are prepared to help reintegrate me as a contributing member of society.

I respectfully request that a motion for compassionate release be filed on my behalf.

II. BASIS FOR RELEASE

Pursuant to BOP Program Statement 5050.50 section 4(a), inmates sentenced for an offense that occurred on or after November 1, 1987 (e.g., “new law”), who are age 70 years or older and have served 30 years or more of their term of imprisonment are eligible for the relief requested herein. I am 71 years of age and will turn 72 in less than one month’s time. To date, I have served 30 years, one month, and 3 days and have earned an additional 4

1 years of good conduct credit. I, therefore, meet the necessary requirements for requesting a
 2 recommendation for compassionate release.

3 **A. FACTORS SUPPORTING A RECOMMENDATION FOR COMPASSIONATE**
 4 **RELEASE**

5 Pursuant to § 571.61(a)(1), I state here the extraordinary and compelling
 6 circumstances in favor of my release:

7 On August 21, 1991, I was sentenced to 505 years in prison by U.S. District Judge
 8 William D. Keller. I was convicted of one count of conspiracy to launder money, in
 9 violation of 18 U.S.C. §§ 371, 1956, an offense which carried a five-year statutory
 10 maximum sentence, and twenty-five counts of aiding and abetting money laundering, in
 11 violation of 18 U.S.C. §§ 2, 1956(a)(1), an offense which carried a twenty-year statutory
 12 maximum sentence per count. *See* Presentence Investigation Report (“PSR”). The court
 13 found that the value of the laundered funds that qualified as relevant conduct (on a
 14 conspiracy theory) under the Sentencing Guidelines was well over \$100 million. *See*
 15 Sentencing Tr., Vol. 2, 191:17-19 (Aug. 21, 1991). The court determined a total offense
 16 level of 45 and a criminal history category of I, for which the Sentencing Guidelines then
 17 mandated a term of life. *Id.* at Vol. 1, 75:11-13, 86:21-23, 175:4-6.

18 Determined to arrive at the mandatory life sentence although the statute of
 19 conviction provided for a term of years, Judge Keller consulted with the Sentencing
 20 Commission hotline. *Id.* at Vol. 2, 192:17-193:13. After apparently being advised that he
 21 could not legally impose a life sentence, Judge Keller nevertheless imposed a sentence that
 22 would amount to life—or, more accurately, several lifetimes. Judge Keller ordered that the
 23 statutory maximum sentence for each count be imposed, and that each of the resulting 26
 24 sentences run consecutively, for a total sentence of 505 years. *Id.* at 194:8-18.

25 On appeal, the Ninth Circuit remanded my sentence to the district court for further
 26 findings of fact and for resentencing if necessary, holding that the district court failed to
 27 make specific findings as to my responsibility for the amount of money laundered and
 28 noting that I “was not personally involved in handling all of the funds.” *U.S. v. Andonian*,

29 F.3d 634, *11 (9th Cir. 1994) (unpublished). On remand, the district court summarily determined that its original, 505-year sentence was supported by its findings that \$118 million laundered by co-conspirators was reasonably foreseeable to me and within the scope of my agreement, and that resentencing was therefore unnecessary. *See U.S. v. Andonian*, No. 2:89-cr-190-WDK, Dkt. No. 1104, at 1-2 (Mar. 3, 1995).

1. **Post-Booker Sentencing Calculation**

If I were sentenced today, post-*Booker* and therefore under the advisory Guidelines regime,¹ I would likely have received a sentence well under 361 months, which is the amount of actual time I have served to date.

First, from October 1, 2017 through June 30, 2018, judges have sentenced below Guideline range in 60.4% of all money laundering cases. *See* U.S. Sent’g Comm’n Quarterly Data Report, 3rd Quarter Release, Preliminary Fiscal Year 2018 Data through June 30, 2018, at p. 15 (Table 10A). The median extent of non-government sponsored downward variance is 50%. *Id.* at p. 24 (Table 16A). If I were to receive the median percentage decrease of 50%, my life sentence – which the Sentencing Commission calculates as 470 months – would be reduced to 235 months. I have already served 361 months, over 10.5 years longer than my likely sentence. The average sentence for money laundering is 5 years, with a median sentence of 3 years. *Id.* at p. 9 (Table 6).

Though the conspiracy in my case was massive, it is not unprecedented. Over the last several years, many high-profile defendants whose crimes dwarf mine were sentenced to significantly less time than I was. Bernie Madoff, the architect of “the largest, longest, and most widespread Ponzi scheme in history,” responsible for defrauding his investors of \$65 billion, was sentenced to 150 years in prison² – which is less than 30% of my sentence. Arthur Budovsky, the most culpable defendant in a case described by the government as “perhaps the biggest money laundering scheme in U.S. history”³ - involving an

¹ *See United States v. Booker*, 543 U.S. 220 (2005).

² Henriques, Diana B., “Madoff is Sentenced to 150 Years for Ponzi Scheme,” N.Y. Times, June 29, 2009.

³ Hays, Tom, “7 Charged in \$6B Money Laundering Case,” A.P., May 28, 2013.

1 underground hub used to launder \$6 billion in money tied to credit card fraud, identity
 2 theft, investment fraud, computer hacking, child pornography, and drug trafficking – was
 3 sentenced to 20 years.⁴ And Andrew Caspersen, the Wall Street scion who stole \$40
 4 million from his friends and family, was sentenced to four years.⁵

5 *Second*, if sentenced today, the court likely would have sentenced me to less than the
 6 361 months I have already served in order to avoid sentencing me more harshly than a
 7 defendant who:

- 8 • commits second-degree murder (235-293 months);
- 9 • solicits murder for hire (210-262 months);
- 10 • kidnaps someone, uses a weapon, and causes the victim permanent or life-
 11 threatening bodily injury (235-293 months);
- 12 • robs a bank of \$118 million, discharges a firearm, and causes bodily injury
 13 (188-235 months);
- 14 • assaults with intent to commit first-degree murder (135-168 months);
- 15 • pirates an aircraft (235-293 months); or
- 16 • recklessly kills someone (27-33 months).⁶

17 *Third*, I likely would have received a sentence well under 361 months because I did
 18 not receive significant financial benefit from my conduct. In fact, I received nothing. The
 19 money laundering Guidelines analysis, like that of most financial crimes, is driven by loss
 20 amount as a proxy for the seriousness of the offense and the culpability of the defendant.
 21 *See* U.S.S.G. §2S1.1. That a defendant did not benefit financially from such a crime
 22 significantly undermines the rationale of the resulting Guidelines range.⁷ The trial and
 23

24 ⁴ Pagliery, Jose, “Creator of Online Money Liberty Reserve gets 20 Years in Prison,” CNN Money, May 6,
 25 2016.

⁵ Goldstein, Matthew, “Wall St. Scion gets 4 Years in Prison for Fraud,” N.Y. Times, November 4, 2016.

⁶ U.S.S.G. §§2A1.2; 2A1.5; 2A4.1; 2B3.1; 2A2.1; 2A5.1; 2A1.4.

⁷ Numerous courts have criticized the high-loss financial crime Guidelines and their “fetish with abstract arithmetic” as “patently absurd on their face,” *United States v. Adelson*, 441 F.Supp.2d 506, 512, 515 (S.D.N.Y. 2006) (noting the “absurd” sentencing ranges for high-loss frauds “expose[] . . . the utter travesty of justice that sometimes results from the guidelines’ fetish with abstract arithmetic, as well as the harm that guideline calculations can visit on human beings if

1 sentencing court recognized that I did not benefit financially from the crime of conviction.
 2 The court declined to fine or impose costs of imprisonment, noting that, “[Mr. Seresi],
 3 apparently, is a man of rather modest means, and he has two [sic] young children and again
 4 a modest residence.” Sentencing Tr., Vol. 2, 193:14-194:1. While I was convicted of a
 5 very serious crime, the Sentencing Guidelines overstate the severity of my non-violent
 6 offense in providing for a life sentence.

7 *Fourth*, a variance below the Guidelines sentence would also avoid unwarranted
 8 sentencing disparities among similarly-situated defendants, as well as the need to avoid
 9 unwarranted similarities among dissimilarly-situated defendants. *See* 18 U.S.C. §
 10 3553(a)(6); *Gall v. United States*, 552 U.S. 38, 55 (2007). The government divided the
 11 conspiracy with which I was charged into two parts—the Andonian case, No. 2:89-cr-190-
 12 WDK, before Judge Keller, in which I was charged, and the Koyomejian case, No. 2:89-cr-
 13 189-CBM, before Judge Marshall. According to Assistant United States Attorney Richard
 14 G. Rathmann, who prosecuted the Koyomejian case, “the level of sophistication in the
 15 Koyomejian case, in many respects, dwarfed the Andonian case.” Weinstein, Henry,
 16 “Eight Plead Guilty to Money Laundering Counts.” Los Angeles Times, Oct. 2, 1993. Yet
 17 the defendants in the Koyomejian case received significantly lower sentences, ranging from
 18 0 to 23 years with the possibility of reduction for cooperation, than I did. The lead
 19 defendant in the Koyomejian case was released over ten years ago, in January 2007. I was
 20 the fourth charged defendant in the Andonian case and, according to the trial and
 21 sentencing court, the fourth defendant in terms of culpability. *See* Sentencing Tr., Vol. 1,

22
 23
 24 not cabined by common sense” and imposing a sentence of 42 months although the Guidelines
 25 provided for life imprisonment), *aff’d*, 301 F.Appx. 93 (2d Cir. 2008), “a black stain on common
 26 sense,” *United States v. Parris*, 573 F.Supp.2d 744, 754 (E.D.N.Y. 2008), and, ultimately, “of no
 27 help” to the task of ascertaining a minimally-sufficient sentence, *United States v. Watt*, 707
 28 F.Supp.2d 149, 151 (D. Mass. 2010) (imposing a two-year sentence for conspiracy to commit
 identity theft that resulted in losses of \$20 billion). *See also, e.g., United States v. Corsey*, 723
 F.3d 366, 377 (2d Cir. 2013) (Underhill, J., concurring) (describing the high-loss fraud Guideline
 as “fundamentally flawed” and the sentences it produces as “shockingly high”); *United States v.*
Emmenegger, 329 F.Supp.2d 416, 427 (S.D.N.Y. 2004) (describing the amount of loss as a
 “relatively weak indicator of the moral seriousness of the offense or the need for deterrence”).

27:1-7. All four defendants received 505-year sentences. *Id.* at Vol. 2, 193:4-7 (Seresi), 197:14-20 (V. Andonian), 202:11-17 (N. Andonian), 208:11-17 (Vivias).

Fifth, if sentenced today, I likely would have received a below-Guidelines sentence because, as a legal permanent resident, I could face deportation as a result of my convictions. The risk of deportation reduces the amount of imprisonment necessary to punish the offense conduct, since deportation is “a life sentence of banishment in addition to the punishment which a citizen would suffer from the identical acts.” *Jordan v. De George*, 341 U.S. 223, 232 (1951) (Jackson, J., dissenting). Moreover, the possibility of my deportation, in conjunction with my extremely low risk of recidivism, renders the high cost to taxpayers of my life sentence doubly unnecessary.

Had the sentencing court been permitted to weigh all of the 18 U.S.C. § 3553(a) sentencing factors and give a sentence in accordance with that section’s parsimony principle, it likely would have sentenced me to well under the 361 months actual time I have already served.

2. Gold Standard Record During Incarceration

Furthermore, I have been an exemplary inmate throughout my imprisonment. I have received a single, uncontested disciplinary action during my 30 years of incarceration.⁸ This is in spite of the fact that I spent the first 20 years of my incarceration in maximum security facilities – 15 years in Lompoc and 5 years in Atwater, two of the most violent facilities in the country at the time. I believe my stellar record is attributable to my commitment to avoid confrontations, fights, inmate politics, drinking, gambling, drugs, and gangs.

I have spent my years of incarceration learning and reading as much as possible and helping others achieve their educational goals. I earned three associates degrees – in Social & Behavioral Sciences, in Arts & Humanities, and in American Studies – as well as my

⁸ Attached hereto as Exhibit A is a Discipline Hearing Officer Report. I did not contest the facts underpinning the report and respectfully submit that the act described therein was borne of, and motivated by, compassion, not disrespect to the institution and/or its rules and regulations.

1 Legal Assistant/Paralegal Certificate while incarcerated. I have also successfully
 2 completed approximately 85 educational and service-oriented courses.

3 I pose no threat of recidivism or danger to society. I had no criminal history prior to
 4 the offense of my conviction, other than minor vehicle code violations. *See* PSR ¶¶125-
 5 129. At the time of sentencing, I was a married 44-year-old with job skills and no criminal
 6 history points or history of drug use, placing me among the offenders least likely to
 7 recidivate in the entire criminal justice system. I have no history of violence, either before
 8 or during my incarceration. No aspect of the offense of my conviction was violent. *Id.* at
 9 ¶¶8-21. I was, by all accounts, a low-level participant in the crime of conviction. I was
 10 retained as a bookkeeper and was at all times an employee of my co-defendant. *Id.* at ¶43,
 11 ¶59. The nine months of trial transcripts in this multi-defendant case reveal that my role
 12 was minimal and low-level, and there was no evidence adduced that I managed anyone.
 13 *See* Sentencing Tr., Vol. 1, 94:4-95:2. I do not now have, and never did have, ties to large-
 14 scale criminal organizations, gangs, or cartels, as my BOP records will reflect.

15 The conduct which led to my conviction, while both significant and regrettable, was
 16 an aberrant deviation from my otherwise law-abiding life. And in the 30 years of
 17 incarceration since that deviation, I have been a model inmate, have spent my time
 18 growing, learning, and helping others, and have maintained strong bonds with my family. I
 19 am loved by my wife, Maria, my grown children, Patricia, Cristina, and Ricardo, and my
 20 ten grandchildren and step-grandchildren: Shawn (24), Valerie (23), Tristan (14), Giancarlo
 21 (10), Nicolas (7), twins Miranda and Liliana (5), Lucas (5), Guilian (3), and Giovanni (1).
 22 My family visits me every Tuesday and we speak nearly daily on the phone.

23 **III. RELEASE PLAN**

24 Pursuant to § 571.61(a)(2), upon release from prison, I would move in with my
 25 daughter, Patricia, and her family in Santa Clarita. Patricia is a state-certified Spanish-
 26 language interpreter and a valued member of the Los Angeles Superior Court family,
 27 having served the community in that role for 18 years.

1 In addition to my daughter, Patricia, I have significant family support in the Los
2 Angeles area, including my wife, my sister and her children, and my two other children,
3 Cristina and Ricardo, all of whom will continue to provide me with support,
4 encouragement, and financial resources. Due to the support of my adult children, all of
5 whom have successful careers and stable families of their own, I will have fewer challenges
6 when reentering society than I might otherwise face. My children will support me
7 financially, and in return, I will help them by providing childcare for my grandchildren. I
8 am very much looking forward to making up for lost time with them. I will also be able to
9 work with my son, Ricardo, at his electronics repair store.

10 Should I be deported upon release, my family stands ready to support me, both
11 emotionally and financially, in Argentina.

12 **IV. CONCLUSION**

13 For these reasons, I respectfully request the Warden recommend that the BOP file a
14 motion for compassionate release on my behalf.

15
16 Respectfully Submitted,

17
18 Dated: May 1, 2019

19 By: /s/ Juan Carlos Seresi
JUAN CARLOS SERESI

EXHIBIT A

BP-A0304

JAN 17

DISCIPLINE HEARING OFFICER REPORT

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

Institution:	MDC Los Angeles	Incident Report Number:	3027800		
NAME OF INMATE:	SERESI, Juan	REG. NO.:	90574-012	UNIT:	7-South
Date of Incident Report:	August 30, 2017 @ 8:22 p.m.	Offense Code:	217		
Date of Incident:	August 22, 2017 @ 3:02 p.m.				
Summary of Charges:	Giving Money to, or Receiving Money from any Person for the Purposes of Introducing Contraband				
I. NOTICE OF CHARGE(S)					
A. Advanced written notice of charge (copy of Incident Report) was given to inmate on:					
(date) August 30, 2017 at (time) 8:31 a.m. (by staff member) R. Velazquez, Lieutenant					
B. The DHO Hearing was held on (date) September 5, 2017 at (time) 8:10 a.m.					
C. The inmate was advised of the rights before the DHO by (staff member):					
Evans on (date) September 1, 2017 and copy of the advisement of rights form is attached.					
II. STAFF REPRESENTATIVE					
A. Inmate waived right to Staff Representative.			Yes:	X	No:
B. Inmate requested Staff Representative and			N/A appeared.		
C. Staff Representative statement:			N/A		
D. Requested Staff Representative declined or could not appear, but inmate was advised of option to postpone hearing to obtain another Staff Representative with the result that:					
(New Staff Representative Name)			N/A was selected.		
E. Staff Representative :			N/A was appointed.		
III. PRESENTATION OF EVIDENCE					
A. Inmate:	Admits	X	Denies		Neither
the charge(s).					
B. Summary of Inmate Statement: SERESI, Juan, Reg. No. 90574-012, appeared at this hearing and acknowledged receiving a copy of this incident report. He stated he understood his rights before the DHO. He raised no issues about the disciplinary process to this point.					
SERESI admitted the incident report was true during his DHO Hearing. He did not submit any written documentation or evidence on his behalf for consideration by the DHO.					
C. Witnesses:					
1. Inmate waived right to witness(es).			Yes:	X	No:

DISCIPLINE HEARING OFFICER REPORT

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

2. The following persons were called as witnesses at this hearing and appeared (each witness and statement listed below):					
N/A					
3. The following person requested were not called for the reason(s) given (each witness and statement listed below):					
N/A					
Name of Inmate:	SERESI, Juan	Reg. No.:	90574-012	Hearing Date:	September 5, 2017
4. Unavailable witnesses were requested to submit written statements and those statements received were considered (each witness name and statement listed below).					
N/A					
D. Documentary Evidence: In addition to the Incident Report and Investigation, the DHO considered the following documents: Federal Bureau of Prisons TRUVIEW documentation					
E. Confidential information was used by DHO in support of his findings, but was not revealed to the inmate. The confidential information was documented in a separate report. The confidential information has been (confidential informants have been) determined to be reliable because: N/A					
IV. FINDINGS OF THE DHO					
	A. The act was committed as charged.				
X	B. The following act was committed:	328			
	C. No prohibited act was committed: Expunge according to Inmate Discipline PS.				
V. SPECIFIC EVIDENCE RELIED ON TO SUPPORT FINDINGS (Physical evidence, observations, written documents, etc.):					

The DHO finds you committed the prohibited act of Receiving Money or Anything of Value from Another Inmate or Person without Staff Authorization, Code 328.

It should be noted your incident report was written with the prohibited act Code 217. However, the DHO determined the prohibited act Code 328 was appropriate in this particular case. The DHO determined this did not hinder your due process rights nor affected your ability to file an appeal.

You stated you were advised of your rights and you stated you understood your rights. You were again made aware of your rights before the DHO. You did not request for any witnesses nor did you request for a staff representative to assist you in preparing a defense. You have been afforded due process and have had ample time to prepare a defense prior to your Discipline Hearing.

The DHO relied on the reporting staff member's account of the incident report as written. Specifically the reporting staff member documented on August 30, 2017, at approximately 1:30 a.m., SIS staff monitored a suspicious financial transaction. The reporting staff member documented an outside person linked to CHEN, Lei, Reg. No. 55475-112, had made unauthorized deposits into several inmate accounts. The reporting staff member documented the deposits were linked by the outside person's address of 1982 Calle Bogota, Rowland Heights, CA 91748. The reporting staff member documented a SIS review of the inmate financial system revealed two suspicious money deposits were placed into your (SERESI, Juan, Reg. No. 90574-012) account on August 22, 2017, and July 24, 2017. The reporting staff member documented a total of \$400 was received into your account, via Western Union. The reporting staff member documented the outside person Xiuying, Zhang appeared to be a fake contact person. The reporting staff member documented inmates use fake contact information to avoid staff monitoring abilities. The DHO relied on Federal Bureau of Prisons TRUVIEW documentation that further documented these transactions.

The DHO considered during the initial investigation when asked if the incident report was true, you had no comment. The DHO considered during your UDC review when asked if the incident report was true, you had no comment, as well. The DHO drew an adverse inference against you for remaining silent during the initial investigation and UDC review. It was not the only fact used to determine you committed the prohibitive act. However, it was noted you did not refute the charge contained in the incident report when you were given the opportunity on two occasions. The DHO relied upon his experience in a correctional environment that inmates facing a serious charge of this nature, present evidence in their defense, if they perceive the charges are false or unwarranted. The DHO considered you admitted the incident report was true during your DHO Hearing.

Therefore, based on the incident report as written, TRUVIEW documentation, as well as your own admission the incident report was true; the DHO finds you committed the prohibited act of Receiving Money or Anything of Value from Another Inmate or Person without Staff Authorization, Code 328.

VI. SANCTION OR ACTION TAKEN (list each prohibited act with respective sanctions for that act):

Monetary Fine: \$50

BP-A0304
JAN 17

DISCIPLINE HEARING OFFICER REPORT

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

VII. REASON FOR SANCTION OR ACTION TAKEN:

The action/behavior on the part of an inmate to receive money from another inmate, via third party, without staff permission hampers staff's ability to control their area of responsibility. This type of behavior cannot be tolerated in a correctional setting.

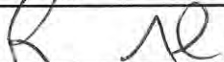
A monetary fine was imposed by the DHO, to correct your misconduct and to deter you from committing future acts of misconduct of this nature.

These sanctions were imposed to correct the present inappropriate behavior and deter future behavior of this type. The DHO hopes these sanctions will motivate you towards more self-discipline in the future.

VIII. APPEAL RIGHTS:

X The inmate has been advised of the findings, specific evidence relied on, action and reasons for the action. The inmate has been advised of his right to appeal this action within 20 calendar days under the Administrative Remedy Procedure. A copy of this report has been given to the inmate.

IX. DISCIPLINE HEARING OFFICER

Printed Name	Signature	Date
R. Ali, Discipline Hearing Officer		September 6, 2017

DHO Report Delivered to Inmate by:


Printed Name (Staff)	Signature	Date and Time:
R. Ali, Discipline Hearing Officer		9/12/2017 6 ⁰⁰ AM

EXHIBIT 2



U.S. Department of Justice

Federal Bureau of Prisons

Office of the General Counsel

Washington, DC 20534

August 5, 2020

MEMORANDUM FOR M. LEJEUNE, ACTING WARDEN
FEDERAL CORRECTIONAL INSTITUTION
MENDOTA, CALIFORNIA

James C Wills for

FROM: Ken Hyle
Assistant Director/General Counsel

SUBJECT: SERESI, Juan Carlos
Federal Register No. 90574-012
Request for Reduction in Sentence

Please be advised that Mr. Seresi's request for a reduction in sentence (RIS) pursuant to 18 U.S.C. § 3582(c)(1)(A)(i) and PS 5050.50, Compassionate Release/Reduction in Sentence: Procedures for Implementation of 18 U.S.C. §§ 3582(c)(1)(A) and 4205(g), section 4(a) ("New Law' Elderly Inmates"), is denied. We have carefully reviewed the documentation submitted with this request and have consulted with the Assistant Director of the Correctional Programs Division.

Section 4(a) provides that an inmate sentenced for an offense that occurred on or after November 1, 1987, may be considered for a RIS once he is 70 years old or older and has served at least 30 years of his term of imprisonment. In addition, section 7 requires consideration of factors such as the nature and circumstances of the inmate's offense; his criminal history, including any supervised release violations; unresolved detainers; and whether release would minimize the severity of the offense or pose a danger to the safety of any other person or to the community.

Mr. Seresi, age 73, has served over 31 years of his 505-year sentence. BOP records reflect an offense date of June 3, 1988.

Mr. Seresi therefore meets the criteria for a RIS under section 4(a). However, due to the nature and circumstances of his offense, his release would minimize the severity of his criminal conduct. Additionally, Mr. Seresi is subject to an Immigration and Customs Enforcement (ICE) detainer, and ICE would initiate removal proceedings were Mr. Seresi granted a RIS. Accordingly, his RIS request is denied.

Please provide Mr. Seresi with a copy of this decision.

cc: T. Ray Hinkle, Acting Regional Director, Western Region

EXHIBIT 3

Coastline Community College

*Upon recommendation of the Faculty and
under authorization granted by the Board of Trustees*

the Associate in Arts in

Social & Behavioral Science

is hereby conferred upon

Juan Carlos Seresi

*with all Rights, Benefits and Privileges appertaining thereto
in evidence of the satisfactory completion of the program.*

Given in the month of December, 2012

Therese Prusky
President, District Board of Trustees



Lolita P. Adrian
President

Coastline Community College

*Upon recommendation of the Faculty and
under authorization granted by the Board of Trustees*

*the Associate in Arts in
Arts & Humanities*

is hereby conferred upon

Juan Carlos Seresi

*with all Rights, Benefits and Privileges appertaining thereto
in evidence of the satisfactory completion of the program.*

Given in the month of May, 2015.

C. Moreno

President, District Board of Trustees



Loretta P. Adrian

President

Coastline Community College

*Upon recommendation of the Faculty and
under authorization granted by the Board of Trustees*

*the Associate in Arts in
American Studies*

is hereby conferred upon

Juan Carlos Teresi

*with all Rights, Benefits and Privileges appertaining thereto
in evidence of the satisfactory completion of the program.*

Given in the month of May, 2015.

C. Moreno

President, District Board of Trustees



Loretta P. Adrian

President

BLACKSTONE PARALEGAL STUDIES, INC



July 20, 2001

Juan Carlos Seresi
3901 Klein Blvd.
Lompoc, CA 93436

Dear Juan:

We wish to congratulate you upon satisfactory completion of your Legal Assistant/Paralegal curriculum. We have enclosed your graded transcript and your Certificate of Completion. We hope that you will be pleased with the Certificate of Completion and that you will prize it highly. It should always remind you of a period of very earnest, conscientious effort and achievement on your part.

Your relationship with us need not end at this point. At least write us occasionally of your progress and experiences.

We consider it a privilege and honor to award you our Certificate of Completion and trust that the knowledge gained will enrich your entire life.

Sincerely,

James W. Fry, Jr.
President

JWF/drm

BLACKSTONE PARALEGAL STUDIES, INC

Legal Training Since 1890

915 Clock Hours

Student JUAN CARLOS SERESI Matriculation Number 84966Address 3901 KLEIN BLVD. LOMPOC, CA 93436Matriculation Date 07/01/1999 Completion Date 07/20/2001

TEXT and SUBJECT		GRADE	TEXT and SUBJECT		GRADE
Volume 1			Volume 6 (continued)		
Introduction to Law	Test 1	96	Practice in Civil Actions	Test 17	91
Contracts	Test 2	100	Criminal Procedure	Test 18	92
Contracts	Test 3	96			
Contracts	Test 4	98	Volume 7		
			Wills	Test 19	97
Volume 2			Wills	Test 20	94
Law of Torts	Test 5	100	Trusts	Test 21	100
Law of Torts	Test 6	98			
Law of Torts	Test 7	100	Volume 8		
Law of Torts	Test 8	100	Law of Private Corporations	Test 22	96
			Law of Partnerships	Test 23	100
Volume 3			Law of Partnerships	Test 24	96
Criminal Law	Test 9	97			
Criminal Law	Test 10	95	Volume 9		
			Constitutional Law	Test 25	100
Volume 4			Constitutional Law	Test 26	95
Real Property (Part I)	Test 11	100			
Real Property (Part I)	Test 12	97	Volume 10		
			Constitutional Law	Test 27	88
Volume 5					
Real Property (Part II)	Test 13	100	Legal Research I	Composite Score	83
Real Property (Part II)	Test 14	97	Legal Research II	Composite Score	91
Volume 6			Employability Skills	Composite Score	96
Pleadings in Civil Actions	Test 15	91			
Pleadings in Civil Actions	Test 16	100	Ethics for Paralegals		95

95 - 100 Excellent; 90 - 94 Very Good; 85 - 89 Good; 80 - 84 Fair; 75 - 79 Satisfactory
Below 75 Unsatisfactory

This document issued July 20, 2001**BLACKSTONE PARALEGAL STUDIES, INC**By P. Legend
Registrar

Blackstone Paralegal Studies, Inc.




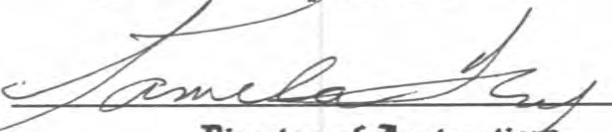
DALLAS, U. S. A.
915 CLOCK HOURS
confers this certificate of

Legal Assistant/Paralegal *upon* JUAN CARLOS SERESI

*who has fulfilled all the requirements prescribed by the School
and is entitled to all of the honors, rights and privileges
thereunto appertaining.*

*In Testimony Whereof this recognition of achievement is
Given this 20th day of July A.D. 2001 at Dallas
in the State of Texas.*




President

Director of Instruction

MENCG
PAGE 001INMATE EDUCATION DATA
TRANSCRIPT08-06-2015
09:14:04REGISTER NO: 90574-012
FORMAT.....: TRANSCRIPTNAME.: SERESI
RSP OF: MEN-MENDOTA FCI

FUNC: PRT

----- EDUCATION INFORMATION -----

FACL	ASSIGNMENT	DESCRIPTION	START DATE/TIME	STOP DATE/TIME
MEN	ESL HAS	ENGLISH PROFICIENT	09-24-1991 1439	CURRENT
MEN	GED HAS	COMPLETED GED OR HS DIPLOMA	09-30-1992 1256	CURRENT

----- EDUCATION COURSES -----

SUB-FACL	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
MEN	REC ASSIST(AIDE) CL/TH/2-3PM	07-07-2015	CURRENT				
MEN	ATTITUDE ADJUSTMENT	06-24-2015	07-15-2015	P	C	P	4
MEN	BEG CARD MAKING/FRI 530-630	05-04-2015	06-25-2015	P	C	P	8
MEN	THINKING ON YOUR FEET	05-28-2015	06-23-2015	P	C	P	2
MEN	HEALTH & NUTRIT CL/T&TH/6-7PM	05-13-2015	06-03-2015	P	C	P	8
MEN	INMATE HEALTH FAIR-DATES VARY	03-23-2015	03-23-2015	P	C	P	2
MEN	HLTH CONSCIOUS/M&F/5:20-6:20P	01-05-2015	03-10-2015	P	C	P	11
MEN	ADVANCED CHESS/630-730P/TH-F	09-22-2014	01-05-2015	P	C	P	1
MEN	EDU/POSTSECONDARY/IND.STUDY	06-24-2014	10-14-2014	P	W	I	0
MEN	BEGINNING CHESS/630-730P/M-TU	05-09-2014	09-08-2014	P	C	P	12
VIM	COASTLNE COM COL AA DEGREE	10-01-2013	04-01-2014	P	C	P	360
VIM	ACE TYPING - TUESDAY EVENING	12-04-2013	01-21-2014	P	C	P	10
VIM	COASTLNE COM COL BUSINESS WRI	08-27-2012	05-27-2013	C	C	P	0
VIM	COASTLNE COM COL BUSINESS ENG	01-28-2013	05-27-2013	C	C	P	0
VIM	IVANHOE SELF-STUDY	07-11-2013	09-10-2013	P	C	P	10
VIM	ACE - LITERATURE - METROPOLIS	04-17-2013	06-28-2013	P	C	P	3
VIM	ACE RED BADGE OF COURAGE	01-07-2013	02-28-2013	P	C	P	10
VIM	ACE - LITERATURE - MOBY DICK	12-03-2012	01-03-2013	P	C	P	10
VIM	BEGINNERS BEADING CLASS	05-18-2012	06-22-2012	P	C	P	6
VIM	WEIGHT MANAGEMENT CLASS	08-18-2012	09-22-2012	P	C	P	6
VIM	CORE STABILITY INSTRUCT TRAIN	08-20-2012	09-24-2012	P	C	P	6
VIM	GULLIVER'S TRAVELS	05-01-2012	05-31-2012	P	C	P	10
VIM	ACE ROBINSON CRUSOE SELF STUDY	04-02-2012	04-30-2012	P	C	P	10
VIM	ACE TIME MACHINE SELF STUDY	03-01-2012	03-31-2012	P	C	P	10
VIM	ACE 20000 LEAGUES UNDER THE SE	02-01-2012	02-29-2012	P	C	P	10
VIM	ACE THE MAN IN THE IRON MASK	01-03-2012	01-03-2012	P	C	P	10
VIM	IVANHOE SELF-STUDY	12-01-2011	12-30-2011	P	C	P	10
ATW	APPRENTICESHIP - TEACHER AIDE	06-28-2007	06-22-2008	P	W	I	1040
VIM	ACE VET ASSISTANT 1 & 2	01-09-2010	05-20-2010	P	C	P	100
VIM	ACE PALS TRAIN/TRAINER PROGRAM	01-09-2010	05-20-2010	P	C	P	100
VIM	ACE INTERMEDIATE STOCK INVEST	01-08-2010	03-26-2010	P	C	P	10
VIM	ACE SHELTER ASSISTANT	09-10-2009	12-18-2009	P	C	P	100
VIM	ACE BASIC STOCK INVESTING	09-29-2009	12-18-2009	P	C	P	10
VIM	ACE KENNEL ASSISTANT	09-10-2009	12-03-2009	P	C	P	100
VIM	RPP FCI 1 PUBLIC SPEAKING (C6)	09-15-2009	10-05-2009	P	C	P	7
VIM	ACE AUTOMOTIVE ELECTRONICS	07-05-2009	09-29-2009	P	C	P	10
VIM	PARENTING FROM A DISTANCE	07-12-2009	09-27-2009	P	C	P	10
VIM	ACE AUTOMOTIVE BRAKES & TRANS	05-13-2009	06-23-2009	P	C	P	10
ATW	BEGINNING RUSSIAN	12-18-2008	03-14-2009	P	C	P	20
ATW	ACE BASIC ARITHMETIC	12-15-2008	03-14-2009	P	C	P	20

G0002

MORE PAGES TO FOLLOW . . .

MENCG
PAGE 002

INMATE EDUCATION DATA
TRANSCRIPT

08-06-2015
09:14:04

REGISTER NO: 90574-012 NAME: SERESI
FORMAT: TRANSCRIPT RSP OF: MEN-MENDOTA FCI

FUNC: PRT

----- EDUCATION COURSES -----

SUB-FACL	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
ATW	INTRODUCTION TO WORLD HISTORY	12-17-2008	03-14-2009	P	C	P	20
ATW	BEG NUTRITION & RPP CLASS USP	12-13-2008	01-31-2009	P	C	P	8
ATW	INTRODUCTION TO WORLD HISTORY	04-13-2008	06-16-2008	P	C	P	20
ATW	INTRO TO LATIN CULTURE	10-14-2007	12-16-2007	P	C	P	20
ATW	OFFICE AUTOMATION-COLLEGE	07-02-2007	08-30-2007	P	C	C	102
ATW	INTERMEDIATE INVESTING	04-15-2007	06-23-2007	P	C	P	20
ATW	INTERMEDIATE INVESTING	04-13-2007	06-23-2007	P	C	P	20
ATW	INTERMEDIATE INVESTING	04-15-2007	06-23-2007	P	C	P	20
ATW	ACE SMALL BUSINESS DEV	01-14-2007	03-24-2007	P	C	P	40
ATW	INTRO TO HEAT, VENT. & A/C	01-14-2007	03-24-2007	P	C	P	40
ATW	VT OFFICE AUTOMATION	09-15-2006	12-22-2006	P	C	M	108
ATW	OFFICE AUTOMATION-COLLEGE	08-16-2005	09-15-2005	P	C	C	108
LOM	CODE ORIENTATION	12-15-2002	07-20-2005	P	C	P	20
LOM	ANGER MANAGEMENT	07-09-2003	02-20-2004	P	C	P	20
LOM	BASIC CONVERSATIONAL RUSSIAN	03-19-2005	07-27-2005	P	W	I	30
ATW	CHARACTER/PORTRAIT ANIMATION E	05-27-2005	07-15-2005	P	C	P	8
LOM	RELAPSE PREVENTION	08-02-2004	11-02-2004	P	C	P	40
LOM	RELAPSE PREVENTION	08-29-2003	11-02-2004	P	C	P	40
LOM	ACE EVENING EDUCATION	06-23-2004	09-22-2004	P	C	P	28
LOM	VT BUSINESS COMPUTER AM	01-27-2003	03-18-2004	P	C	M	250
LOM	CRIMINAL LIFESYLES 1	03-31-2003	08-20-2003	P	C	P	40
LOM	CRIMINAL LIFESYLES 2	05-30-2003	08-07-2003	P	C	P	20
LOM	CRIMINAL LIFESYLES 1	03-31-2003	05-30-2003	P	C	P	20
LOM	LEGAL RESEARCH MON 7-8:30 PM	02-11-2002	04-22-2002	P	C	P	20
LOM	SMALL BUSINESS M-W 7-9:00PM	07-05-2001	09-28-2001	P	C	P	52
LOM	BUSINESS 359	09-28-2001	09-28-2001	P	C	P	1
LOM	ADVANCED BUSINESS COMPUTERS	05-05-2000	01-16-2001	P	C	M	250
LOM	CHESS T 700-800PM SAT 100-300P	07-01-2000	11-04-2000	P	C	P	16
LOM	RPP HOBBYSHOP	05-21-2000	05-21-2000	P	C	P	1
LOM	CREATIVE WRITING	10-28-1999	02-03-2000	P	C	P	20
LOM	HOBBYSHOP INSTRUCTIONS	10-22-1999	05-21-2000	P	C	P	60
LOM	CREATIVE WRITING FPC	10-28-1999	02-03-2000	P	C	P	22
LOM	INTRODUCTION TO WELLNESS	10-25-1996	09-15-1999	P	C	P	40
LOM	RPP WRITING	02-03-1999	02-03-1999	P	C	P	1
LOM	INDOOR SOCCER LEAGUE PLAY	11-03-1998	01-12-1999	P	C	P	12
LOM	UNDERSTANDING BASIC NUTRITION	09-17-1996	01-21-1997	P	C	P	140
LOM	SMALL BUSINESS DEVELOPMENT	10-02-1996	12-11-1996	P	C	P	40
LOM	MATH CLASS WED/THURS 7-9:00PM	06-28-1996	09-19-1996	P	C	P	30
LOM	VT BUSINESS COMPUTER PM	02-28-1996	09-05-1996	P	C	M	180
LOM	PARENTING USP II	06-27-1996	09-03-1996	P	C	P	80
LOM	RPP PARENTING	09-03-1996	09-03-1996	P	C	P	1
LOM	PARENTING PROGRAM USP	04-07-1996	06-11-1996	P	C	P	25
LOM	SMALL BUSINESS DEVELOPMENT	11-13-1994	07-03-1995	P	C	P	73
LOM	VT BUSINESS COMPUTER PM	03-05-1993	02-08-1995	P	C	M	1200
LOM	DEVELOPING YOUR POTENTIAL	04-23-1994	06-14-1994	P	C	P	50

G0002 MORE PAGES TO FOLLOW . . .

* MENC *
PAGE 003 OF 003 *

INMATE EDUCATION DATA
TRANSCRIPT

* 08-06-2015
* 09:14:04

REGISTER NO: 90574-012
FORMAT.....: TRANSCRIPT

NAME...: SERESI
RSP OF: MEN-MENDOTA FCI

FUNC: PRT

----- EDUCATION COURSES -----							
SUB-FACL	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
LOM	LANGUAGE ARTS AM	10-04-1991	10-23-1991	P	C	P	20

G0000

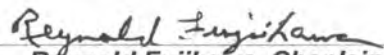
TRANSACTION SUCCESSFULLY COMPLETED

Certificate of Appreciation

FOR YOUR HELP & ASSISTANCE

• Juan Carlos Seresi •

This certificate acknowledges that the above-named person gave of himself and his time for the "Kairos Number Twenty" gathering held October 11th throughout October 13, 2003, at the United States Penitentiary in Lompoc, California. You are appreciated & will be remembered by us all.


Reynold Fujikawa, Chaplain


John F. Burke, Chaplain


Greg Nelson, Chaplain

Certificate of Appreciation

FOR YOUR HELP & ASSISTANCE

• *Juan Carlos Seresi* •

This certificate acknowledges that the above-named person gave of himself and his time for the "Kairos Number Nineteen" gathering held February 19 throughout February 21, 2005, at the United States Penitentiary in Lompoc, California. You are appreciated & will be remembered by us all.


Chaplain Reynold Fujikawa


Deacon John F. Burke


Chaplain Greg Nelson

Certificate of Achievement

This certifies that:

Juan Carlos Seresi

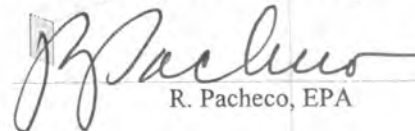
has successfully completed the specialized course in:

**• Microsoft Excel 2000 •
85-Hour Course**

and is therefore honored this 8th day of January 2001


K. Towner, Instructor

VTC 709


R. Pacheco, EPA



Certificate of Completion

This certifies that:

Juan Carlos Seresi

has successfully completed the course:

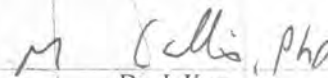
• **C a g e Y o u r R a g e** •

and is therefore honored this 12th day of December 2003.



A. Cooks
Psychologist Treatment Specialist

For



Dr. J. Kerr,
Chief Clinical Psychologist

Certificate of Achievement

This certifies that:

Juan Carlos Seresi

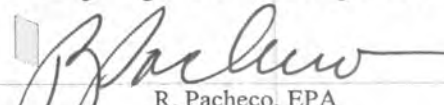
has successfully completed the specialized course in:

**• Microsoft Word 2000 •
85-Hour Course**

and is therefore honored this 8th day of January 2001


K. Towner, Instructor

VTC 708


R. Pacheco, EPA



CERTIFICATE OF COMPLETION

FCI-1 VICTORVILLE EDUCATION DEPARTMENT

Certifies that

JUAN SERESI

Has satisfactorily completed 10 participation hours

On this 28 day of December 2012 in

CLASSIC LITERATURE: MOBY DICK


J.Vandiver, A.C.E. Coordinator

CERTIFICATE OF COMPLETION

Federal Correctional Complex

VICTORVILLE EDUCATION DEPARTMENT

Certifies that

Juan Carlos Seresi

has satisfactorily completed **10** hours of coursework in

Literature - The Red Badge of Courage

February 28, 2013



W. Young, A.C.E. Coordinator

CERTIFICATE OF COMPLETION

Federal Correctional Complex

VICTORVILLE EDUCATION DEPARTMENT

certifies that

Juan Carlos Seresi

has satisfactorily completed **3** hours of coursework in

ACE Literature - "Metropolis"

June 28, 2013


W. Young, A.C.E. Coordinator

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Transportation Security

Extreme Weather Driving: For all Drivers

Commercial Motor Vehicle Inspections

Hours-Of-Service Rules: What You Need To Know

Commercial Motor Vehicle Driving Logs


Training Coordinator

Lemon Book

Certificate of Completion


FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Workers Compensation - Supervisors
Flaggers' Safety in Highway Work Zones
Arc Flash Safety
Material Handling Aids
Abrasive Grinding Wheels



Training Coordinator

Coral Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Portable Power Tool Safety

Hand Tool Safety

Eye Protection

Spill Prevention and Control

MSDS-Material Safety Data Sheets


Training Coordinator

Yellow Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Working in Cold Conditions

Working in Hot Conditions

Trenching-Competent Person

Lead Safety in Construction

Introduction to Rough Terrain-Forklift Safety



Training Coordinator

Cream Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Behavior-Based Safety For Supervisors

Disaster Planning-Employees

Safety Attitude

Welding, Cutting and Brazing

Introduction to OSHA and the General Duty Clause



Training Coordinator

Gray Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Accident Investigation

ADA-Americans with Disabilities Act


Bloodborne Pathogens - General

Compressed Gases

Working Safely with Corrosives

Permit Required - Confined Spaces - Entrant

Permit Required - Confined Spaces - Attendant


Training Coordinator

Certificate of Completion

FCI Mendota Education Department


Certifies that

SERESI, JUAN

Has successfully completed the following program

ACE Attitude

This certificate is hereby issued on the 17th day of July, 2015


Training Instructor

FCI MENDOTA

Spinning Class

THIS CERTIFIES THAT

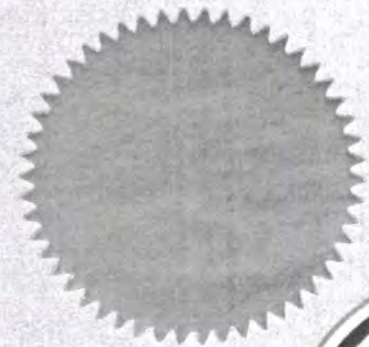
Seresi, J.

Has successfully completed all requirements
pertaining to the course of instruction in
Spinning Class for the Recreation Department.

Given this 8th day of July, 2015

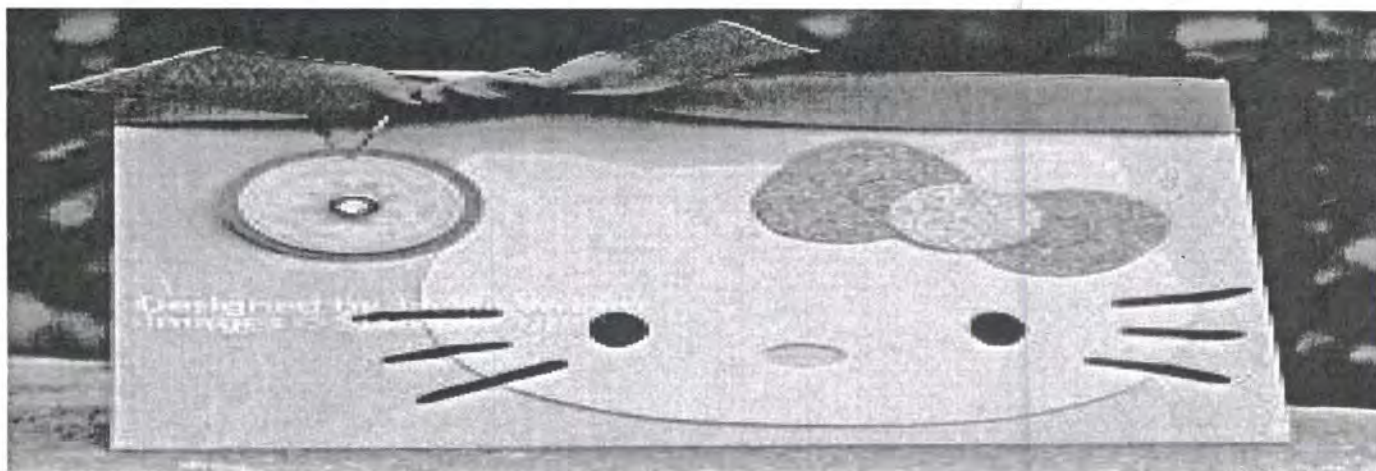


E. Davila, Recreation Specialist



Certificate of Achievement

Awarded to: SERSI, J.



For the successful completion of the
BEGINNER CARD MAKING CLASS

Through the Leisure Program at FCI Mendota Recreation Department
Given this 3RD day of JULY 2015

A handwritten signature in black ink, appearing to be 'E. Becerra'.


E. BECERRA RECREATION SPECIALIST

Certificate of Completion


J. Seresi

The above named participant has successfully completed the
USP Atwater Nutrition Class.




S. Caes, Supervisor of Recreation

2-1-09



F. Aguilar, Recreation Specialist

Certificate of Appreciation

FOR YOUR HELP & ASSISTANCE

• *Juan Carlos Seresi* •

This certificate acknowledges that the above-named person gave of himself and his time for the "*Kairos Number Twenty-Two*" gathering held February 19 throughout February 21, 2005, at the United States Penitentiary in Lompoc, California. You are appreciated & will be remembered by us all.


Chaplain Reynold Fujikawa


Deacon John F. Burke


Chaplain Greg Nelson

Certificate of Appreciation

FOR YOUR HELP & ASSISTANCE

• • Juan Carlos Seresi • •

This certificate acknowledges that the above-named person gave of himself and his time for the "Kairos Number Eighteen" gathering held October 11 to October 14, 2002, at the United States Penitentiary in Lompoc, California. You are appreciated & will be remembered by us all.

Deacon John F. Burke
Deacon John F. Burke,

Kairos # 18

Fr. Michael Kirkness
Fr. Michael Kirkness, Chaplain

Certificate of Appreciation

FOR YOUR HELP & ASSISTANCE

• • Juan Carlos Serezi • •

This certificate acknowledges that the above-named person gave of himself and his time for the “Kairos Number Seventeen” gathering held the weekend of May 24 to May 27, 2002, at the United States Penitentiary in Lompoc, California. You are appreciated & will be remembered by us all.


Deacon John F. Burke,


Fr. Michael Kirkness, Chaplain


Chaplain D. Greg Nelson

Certificate of Appreciation

FOR YOUR HELP & ASSISTANCE

• Juan Carlos Seresi •

This certificate acknowledges that the above-named person gave of himself and his time for the "Kairos Number Nineteen" gathering held May 23 throughout May 26, 2003, at the United States Penitentiary in Lompoc, California. You are appreciated & will be remembered by us all.


Reynold Fujikawa, Chaplain


Deacon John F. Burke,


Greg Nelson, Chaplain

Certificate of Appreciation

FOR YOUR HELP & ASSISTANCE

• • *Juan Carlos Peresi* • •

This certificate acknowledges that the above-named person gave of himself and his time for the "Kairos Number Sixteen" gathering held the weekend of October 6-8, 2001, at the United States Penitentiary in Lompoc, California. You are appreciated & will be remembered by us all.

Deacon John F. Burke,

Fr. Michael Kirkness, Chaplain

Chaplain D. Greg Nelson

Certificate of Appreciation

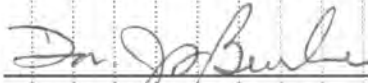
For your Help & Assistance

●● **Juan Carlos Seresi** ●●

**This Certificate Acknowledges That the Above-named Person
Gave Himself and His Time for the "Kairos Number
Twenty-one" Gathering Held May 28 to May 31, 2004, at the
United States Penitentiary in Lompoc, California. You Are
Appreciated & Will Be Remembered by Us All.**



Rev. G. Nelson, Chaplain



Deacon John F. Burke, Chaplain



Rev. R. Fujikawa, Chaplain

CERTIFICATE OF COMPLETION

FCI-1 VICTORVILLE EDUCATION DEPARTMENT

Certifies that

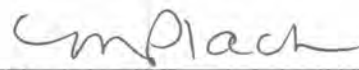
JUAN CARLOS SERESI

Has satisfactorily completed 10 participation hours

On this 27th day of January 2012 in

THE MAN IN THE IRON MASK


J. Vandiver, Adult Continuing Education
Coordinator


M. Placker, Assistant Supervisor of Education

Certificate of Completion

FCC Victorville Safety Department

Certifies that

J. C. Seresi

has completed and passed the certification exams
for the courses of

Respiratory Protection-Healthcare Workers

Respiratory Fit Testing

Noise & Hearing Conservation

Machine Guarding

Lockout/Tagout Authorized Employee



Training Coordinantor

09/30/20

Certificate of Completion

FCC Victorville Safety Department
Certifies that

J. C. Seresi

has completed and passed the certification exams
for the courses of

Back Safety
Forklift Safety
Personal Protective Equipment
Hazard Communication


Training Coordinator

Certificate of Completion

FCC Victorville Safety Department

Certifies that

Juan Carlos Seresi

has completed and passed the certification exams
for the courses of

Bloodborne Pathogens For Corrections

Respiratory Protection

Disposable Respirators

Confined Spaces - General

Slips, Trips, & Falls

Fire Safety

Electrical Safety



Training Coordinator

11/06/12

Certificate of Completion

FCC Victorville Safety Department

Certifies that

J. C. Seresi

has completed and passed the certification exams
for the courses of

Defensive Driving
Saving Energy at Work & Beyond
Workplace Safety for Employees
Stress Management
Good Housekeeping

Training Coordinator

11/27/12

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Crane Rigging

Crane Rigging In Construction

Permit-Required Confined Space Rescue

Preventing Slips, Trips & Falls - Employees

Slips, Trips & Falls - Supervisors


Training Coordinator

Grape Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Exit Routes-Supervisors

Job Hazard Analysis

HAZWOPER-First Responder

Emergency Action and Fire Prevention

Office Hazards


Training Coordinator

Fuchsia Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Flammable & Combustable Liquids

Battery Safety

Forklift & Pedestrian Safety

Reactive Chemicals

Forklift Operator Safety



Training Coordinator

Orange Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Dipping, Coating & Cleaning Operations
Preventing Amputations
Introduction To Industrial Hygiene
Housekeeper Safety
Silicosis Prevention



Training Coordinator

Teal Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

J.C. Seresi

has completed and passed the certification exams
for the courses of

Flammable & Combustable Liquids

Battery Safety

Forklift & Pedestrian Safety

Reactive Chemicals

Forklift Operator Safety



Training Coordinator

10/12/12

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

**Lead Safety-General Industry
Wellness and You
Hazard Communication Refresher
Asbestos Awareness
Laundry Safety**



Training Coordinator

Forest Green Book

Certificate of Completion

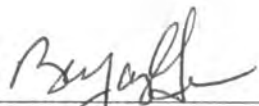
FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Kitchen Safety
Shiftwork Safety
PPE for Emergency Response
Working Safely Outdoors
Reactive Chemicals



Training Coordinator

Salmon Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Hazardous Material Transportation

Office Ergonomics

Ergonomics - Industrial

Fall Protection in Construction

Aerial Lift Safety

Scaffolds in Construction

Fire Extinguishers



Training Coordinator

Gold Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

J.C. Seresi

has completed and passed the certification exams
for the courses of

Hand Protection
Safety and Health Program
Foot Protection
Eye and Face Protection
Head Protection

Training Coordinator

1/2/2013

Red Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

JUAN CARLOS SERESI

has completed and passed the certification exams
for the courses of

Food Service Safety

Warehouse Safety

Electrical Safety - Unqualified Worker

Mold Hazards and Prevention

Preparing for Weather Emergencies



Training Coordinator

White Book

Certificate of Completion

FCC Victorville Safety Department

Certifies that

J.C. Seresi

has completed and passed the certification exams
for the courses of

Working Safely with Pesticides
Safe Chemical Handling
Ladder Safety
Chemical Labeling
Working Safely with Solvents

Training Coordinator

1/2/2013

Aqua Book

CERTIFICATE OF COMPLETION

FCI-1 VICTORVILLE EDUCATION DEPARTMENT

Certifies that

JUAN SERESI

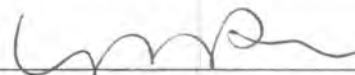
Has satisfactorily completed 10 participation hours

On this 31 day of May 2012 in

GULLIVER'S TRAVELS



J. Vandiver, Adult Continuing Education
Coordinator



M. Placker, Assistant Supervisor of Education

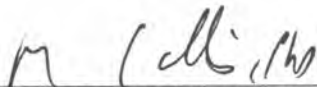
Certificate Of Completion

Juan Seresi

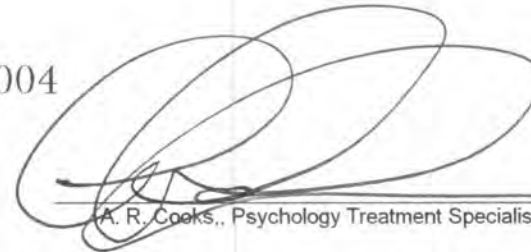
90574-012

*Successfully completed the CODE
"Living With Others"*

December 30, 2004



M. Callis, Ph.D., CODE/DAP Coordinator



A. R. Cooks, Psychology Treatment Specialist

Certificate of Achievement

This certifies that

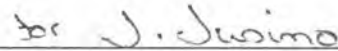
Juan Carlos Seresi

has satisfactorily completed

HVAC

Consisting of 40 hours of Adult Education From January 18th through March 22nd, 2007.

This certificate is hereby issued this 3rd day of April, 2007


M. Chavez, Supervisor of Education


M. Inderbitzen, A.C.E. Coordinator



Certificate of Achievement

This certifies that

Juan Carlos Seresi

has satisfactorily completed

Small Business

Consisting of 40 hours of Adult Education From January 17th through March 21st, 2007.

This certificate is hereby issued this 3rd day of April, 2007

for J. Juwino
M. Chavez, Supervisor of Education

M. Inderbitzen
M. Inderbitzen, A.C.E. Coordinator



Certificate of Completion

This certifies that:

Juan Carlos Teresi

has successfully completed the course:

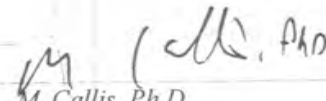
• R e l a p s e P r e v e n t i o n •

and is therefore honored this April 15, 2004.



A. Cooks
Psychologist Treatment Specialist

Cert. No.
04-014



M. Callis, Ph.D.
DAP/CODE Coordinatr

Certificate of Completion

This Is to Certify That

Juan Carlos Teresi

Has completed the program

● ***Commitment to Change*** ●

at the Federal Penitentiary in Lompoc, California.

Therefore is honored this April 6, 2004.



A. Cooks,
Physiologist Treatment Specialist



Dr. M. Callis, Ph.D.
DAP /CODE Coordinator

Certificate of Achievement

This certifies that:

Juan Carlos Peresi

has successfully completed the specialized course in:

Lotus 1-2-3 Version 2.2

and is therefore honored this 27th day of August 1996.


K. Towner, Instructor

VTC 030


L. J. Henderson, EPA



Certificate of Completion

This Certifies That:

Juan Carlos Seresi

has successfully completed the specialized course in:

• **CREATIVE WRITING III** •

and is therefore honored this 1st day of February 2000

D. Clardy
D. Clardy, Teacher

CW200010



Certificate of Achievement

This certifies that:

Juan Carlos Peresi

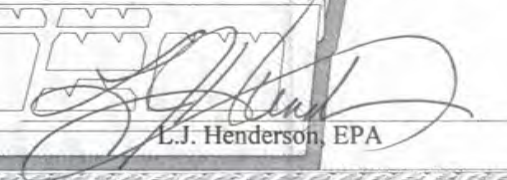
has successfully completed the specialized course in:

**WordPerfect Desktop
Publishing**

and is therefore honored this 27th day of August 1996.


K. Towner, Instructor

VTC 020


L.J. Henderson, EPA



Certificate of Completion

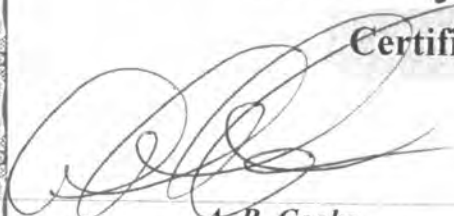
This Is to Certify That

Juan Carlos Seresi

Has completed the Eight -Weeks
"Criminal Lifestyle"

Program at the
United States Penitentiary
in Lompoc, California,
and is therefore honored this
7th day of August, 2003

Certificate Number 2003-111



A. R. Cooks
Psychology Treatment Specialist



Dr. M. Collis, Ph.D.
DAP Coordinator



Certificate of Achievement

This Certifies That

Juan C. Seresi


has satisfactorily completed

Investing 2

Consisting of 20 hours of Adult Continuing Education From April 15th through June 23rd, 2007.

This certificate is hereby issued this 6th day of July, 2007.


M. Chavez, Supervisor of Education


M. Inderbitzen, A.C.E. Coordinator



Certificate of Achievement

This certifies that:

Juan Carlos Seresi

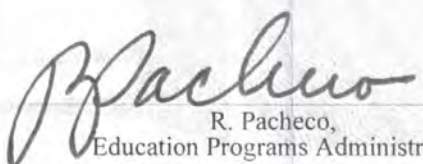
has successfully completed the specialized 85 hour course in:

BUSINESS MANAGEMENT

and is therefore honored this 24th day of October 2001.


M. Stephenson, Instructor

SB 9812


R. Pacheco,
Education Programs Administrator



Certificate of Completion


This Award Is Presented to

Juan Carlos Seresi

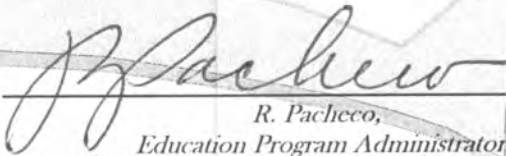
Who has fulfilled all the requirements and is entitled
to all honors, rights, and privileges prescribed by the program

Forbes Stock Market Course

In testimony whereof, this recognition achievement
is given this 28th of September, 2004.


P. Andrews,
Adult Continuing Education Coordinator

Cert. No.
04-012


R. Pacheco,
Education Program Administrator



Certificate of Achievement

This Certifies That

Juan Seresi


has satisfactorily completed

Latin Art Culture

Consisting of 20 hours of Adult Continuing Education From October 14th through December 22nd, 2007.

This certificate is here by issued this 8th day of January, 2008.


Miguel Chavez, Supervisor of Education


Mr. Inderbitzen, ACE Coordinator



CERTIFICATE OF COMPLETION

FCI-1 VICTORVILLE EDUCATION DEPARTMENT

Certifies that

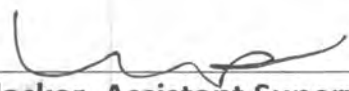
JUAN CARLOS SERESI

Has satisfactorily completed 10 participation hours

On this 29th day of February 2012 in

20,000 LEAGUES UNDER THE SEA


J. Vandiver, Adult Continuing Education
Coordinator


M. Placker, Assistant Supervisor of Education

CERTIFICATE OF COMPLETION

FCI-1 VICTORVILLE EDUCATION DEPARTMENT

Certifies that

JUAN SERESI

Has satisfactorily completed 10 participation hours

On this 30 day of March 2012 in

THE TIME MACHINE



**J. Vandiver, Adult Continuing Education
Coordinator**



M. Placker, Assistant Supervisor of Education

CERTIFICATE OF COMPLETION

Federal Correctional Complex

VICTORVILLE EDUCATION DEPARTMENT

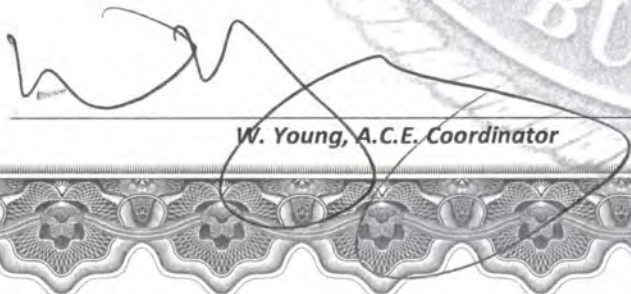
Certifies that

Juan Carlos Seresi

has satisfactorily completed **10** hours of coursework in

Literature - The Red Badge of Courage

February 28, 2013



W. Young, A.C.E. Coordinator

CERTIFICATE OF COMPLETION

FCI-1 VICTORVILLE EDUCATION DEPARTMENT

Certifies that

JUAN SERESI

Has satisfactorily completed 10 participation hours

On this 30th day of December 2011 in

IVANHOE


J. Vandiver, Adult Continuing Education
Coordinator


M. Placker, Assistant Supervisor of Education

CERTIFICATE OF COMPLETION

FCI-1 VICTORVILLE EDUCATION DEPARTMENT

Certifies that

JUAN SERESI

Has satisfactorily completed 10 participation hours

On this 30th day of April 2012 in

ROBINSON CRUSOE


J. Vandiver, Adult Continuing Education
Coordinator


M. Placker, Assistant Supervisor of Education



CERTIFICATE OF COMPLETION

FCC VICTORVILLE EDUCATION DEPARTMENT

This certifies that

Juan Carlos Seresi

has completed 10 hours of study in

Stock Market II

Awarded at FCC Victorville, California

March 31, 2010

A handwritten signature in cursive script, appearing to read 'L. Lau', written over a horizontal line.

L. Lau, Teacher

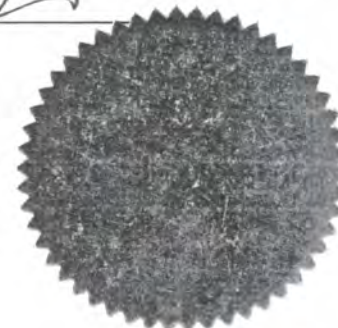
Certificate of Completion

*FCI VICTORVILLE EDUCATION DEPARTMENT
LITERACY PROGRAM*

Certifies that
JUAN CARLOS SERESI
has completed
STOCK MARKET I
January 2010

In recognition of outstanding commitment to academic pursuits

G. Schlottman
ACE Coordinator



Certificate of Completion

This is to certify that:

J.C. SERESI
Has successfully completed the

WALK/RUN PROGRAM LEVEL II



Requiring 100 hours of Training

In Witness Whereof the Undersigned

Given this 1ST day of September, two thousand. 09

A. Pittman

Fitness Coordinator

Certificate of Completion

*FCI VICTORVILLE EDUCATION DEPARTMENT
LITERACY PROGRAM*

Certifies that

Juan Carlos Seresi

has completed

Automotive Disc Brakes

for the Month of July, 2009

In recognition of outstanding commitment to academic pursuits

G. Schlottman
Education Specialist

≈ Certificate of Achievement ≈

This certifies that
J.C. SEREST

has satisfactorily completed
50 & OVER FITNESS PROGRAM

Consisting of 26 Hours of Training

This certificate is hereby issued this 3rd day of September, 2009

A. Pittman

Fitness Coordinator

≈ Certificate of Achievement ≈

This certifies that
Juan Carlos Seresi

has satisfactorily completed
Disk Brakes

Consisting of 10 Hours of Training

This certificate is hereby issued this 7 day of July, 2009



G. Schlottman

CERTIFICATE OF COMPLETION

This certificate is awarded

J. SERESI

for participating and completing the
F.C.I. | Victorville Recreation Department's
50 & Over Exercise Class. Congratulations
on your efforts and dedication in completing this course.
June 23, 2009.



A. Pittman, Sports Specialist

Certificate of Completion

*FCI VICTORVILLE EDUCATION DEPARTMENT
LITERACY PROGRAM*

Certifies that

JUAN CARLOS SERESI

has completed

HOW TO START A PEST CONTROL BUSINESS

for the Month of September 30, 2009

In recognition of outstanding commitment to academic pursuits

G. Schlottman
ACE Coordinator



Certificate of Completion

*FCI VICTORVILLE EDUCATION DEPARTMENT
LITERACY PROGRAM*

Certifies that


JUAN C. SERISI

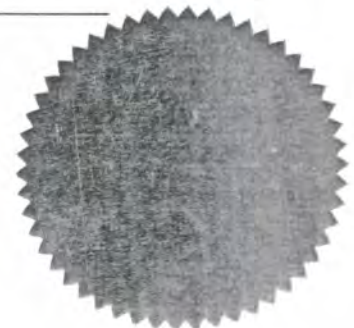
has completed

AUTOMOTIVE ELECTRONICS

for the Month of September 27, 2009

In recognition of outstanding commitment to academic pursuits


G. Schlottman
ACE Coordinator



Certificate of Accomplishment

This is to certify that

Juan Seresi

has successfully completed the **Parenting From A Distance Program**

The Federal Correctional Institution I, Victorville, CA

September 2009

K. Brown, Education Specialist



Certificate of Participation

F.C.I. #1 Victorville, California

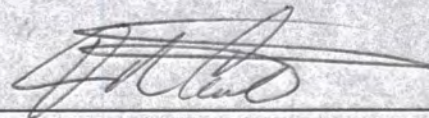
UNIT TEAM

This certifies that

JUAN SERESI

Has Completed: PUBLIC SPEAKING COURSE

SEPTEMBER 2009



*Charles R. Carter, Correctional
Counselor, FCC Victorville*

FCI MENDOTA

Beginning Chess

THIS CERTIFIES THAT

Juan Seresi

Has successfully completed all requirements pertaining
to the course of instruction in Beginning Chess

Given this 19th day of August, 2014



K. R. Jones
Supervisor of Recreation



FCI MENDOTA

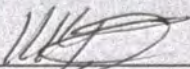
Advance Chess

THIS CERTIFIES THAT

Juan Seresi

Has successfully completed all requirements pertaining
to the course of instruction in Advance Chess

Given this 27th day of December, 2014


K. R. Jones
Supervisor of Recreation



CERTIFICATE OF COMPLETION

Federal Correctional Complex

VICTORVILLE EDUCATION DEPARTMENT

certifies that

Juan Seresi

has satisfactorily completed **10** hours of coursework in the

A.C.E Typing Program

January 21, 2014



F. Ansari Program Coordinator

FCI MENDOTA
Health, Nutrition & Exercise

THIS CERTIFIES THAT

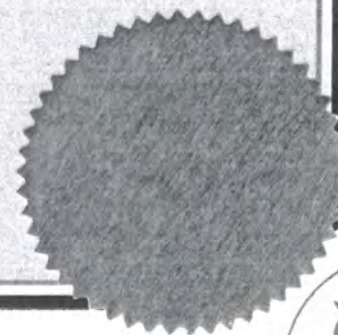
Seresi, J.

Has successfully completed all requirements
pertaining to the course of instruction in
Health and Nutrition for the Recreation Department.

Given this 2nd day of April, 2015



E. Davila, Recreation Specialist



Certificate of Completion

FCI Mendota Education Department


Certifies that

SERESI, JUAN

Has successfully completed the following program

ACE Thinking on Your Feet

This certificate is hereby issued on the 19th day of June, 2015



Training Instructor


FCI MENDOTA
Health Conscious Class

THIS CERTIFIES THAT

Seresi

Has successfully completed all requirements
pertaining to the course of instruction in
Health Conscious Class for the Recreation Department.

Given this 18th day of March, 2015


E. Davila, Recreation Specialist

FCI MENDOTA

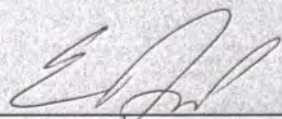
Health Fair

THIS CERTIFIES THAT

Seresi

Has successfully attended and participated in the Recreation
Department Health Fair.

Given this 23rd day of March, 2015



E. Davila, Recreation Specialist

Certificate of Completion

Is Awarded To:

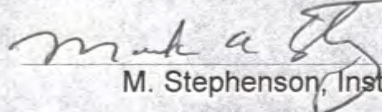
Juan Carlos Serezi

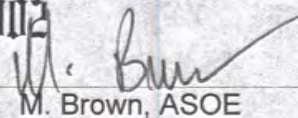
who has fulfilled all the requirements and is entitled
to all honors, rights and privileges prescribed by the program

• **Legal Research** •

In testimony whereof, the recognition of achievement is given

this 29 day of April, 2002


M. Stephenson, Instructor


M. Brown, ASOE



Merced College

Micro-Soft Office Computer Application Training

Certificate of Achievement

Juan C. Seresi

Has Successfully Completed 102-Hours of Computer Application Training
As Listed on Reverse Side of Certificate



Dr. John Spevak
Vice President of Instruction

Issued By: Merced Community College
September 22, 2007

A handwritten signature of Dr. John Spevak, written in cursive, positioned above a horizontal line.

EXHIBIT 4

September 9, 2020

To the Honorable Judge Wilson:

I write this letter to you today and cannot abandon my sense of hope that we will receive a different outcome than we have thus far. My father is Juan Carlos Seresi and he has been incarcerated for over 33 years and his case has been before you for approximately five years. I realize that you are in a difficult position and must weigh many factors when it comes to the decisions you make. The right decision in this case is to let this man be free.

I write this letter to you on behalf of a family that is fully in support of my father. My dad has a wife, three grown children and their spouses, eight grandchildren plus step-grandchildren, a sister, and nieces and nephews who are willing and able to support him if he is to be released. This is evident in the numerous letters that we included in his previous Compassionate Release Petition and what those letters state is still true today. We love my father and have never stopped supporting him during the time he has been incarcerated. We continue to remain in constant communication with him and visit him as often as possible. As a family (both immediate and extended), we stand behind him and ask that you grant him this Compassionate Release.

My father is an exceptional man. He is human and he has always learned from his mistakes to become a better person. The person he is today is a consequence of his complete refusal to let his life circumstances change who he is. After over three decades of being in BOP system, he remains committed to always broadening his mind and maintaining a positive outlook on life. His faith in God is unshakeable.

My father is a very unique person. Although he has been incarcerated for so many years, he is not bitter or resentful. He still has a very positive outlook on life and is always reminding his children that we have to look at the positive things rather than the negative. He is kind and compassionate, intelligent and thoughtful. He has always been motivated to improve himself, even in an utterly sad situation facing a 505-year sentence. During his incarceration, he has been a model inmate. He has received three Associate Degrees while incarcerated and has countless certificates of classes he has completed. He has taken any and every class that he has been able to take advantage of during his incarceration. I don't know that there are many people that would have done the same had they been in his place.

If my dad is granted this Compassionate Release, he will absolutely be welcomed into my home with my family. Our entire family lives very close to each other and we are a constant support system for each another and this situation will be no different. Not a day goes by that I don't wish that things had been different for him and my family. Although it is not possible to change the past, we can only hope that he has some kind of future with us.

My dad is now 73 years old. Sadly, he has missed my entire life and the lives of my sister and brother. We have grown up without him and he has only been able to imagine being present at

all the milestones of our lives. Graduations, weddings, the birth of all of our children, and the deaths of loved ones including two of his own sisters. Imagine all the important moments that happen in a person's life (and the not so important ones). He has missed them all.

What does it take for someone to be given a second chance in this judicial system? Who deserves it? I say my father deserves that second chance. He has held on to the hope for over three decades that the injustice of his sentence will be corrected one day. The cruel and unusual length of his sentence is an outrage. What is in the past cannot be undone but this petition is a way to give him a chance at the relief he deserves. My father has endured more than most people have and has always held on to his dignity and his humanity. He continues to believe that there are good people in this world. I sincerely hope that you can see that my father is a human being that deserves to be given a second chance at life. On behalf of my family and myself, I ask that you please consider granting his Compassionate Release Petition.

Sincerely,


Patricia Mawer

EXHIBIT 5

November 13, 2016

Dear President Obama,

My name is Ricardo Seresi and I am the son of Juan Carlos Seresi. My father has served 27 years of a 505 year sentence. I first must tell you my father is not a career criminal. In fact, this case is his first and only offense. My father was a hands-on dad and was always doing things for his family. Whether it was for sports, schoolwork, or just fun family activities he made sure to always be present. My father was always ready to help my sisters and myself with whatever we needed. If it was schoolwork, our fears, or just advice he always knew what to say to fix the problem. Over the past 28 years my father has been incarcerated and this has not changed. What did change was that he was no longer there for the day to day struggles of life his family would endure.

Most men would have given up on life. My father fought hard to achieve great things while incarcerated. This includes many degrees and finishing many academic courses. He has never had a disciplinary write-up in 27 years of being an inmate, nor any disciplinary actions for that matter. Many would consider him to be the model inmate. I am sure you get many of these letters of people telling you how great of a person their loved one is. However, Your Honor, in my father's case this is true.

My father raised my sisters and me from behind bars being involved in every decision our family made and he is very much the rock of our ever growing family. The three of us have all grown up to be great adults, parents, and spouses. My father has 10 grandchildren and all 10 know who 'Papa' is and love him so very much. I was once a 10 year old boy who needed his father. I am now a grown man who still needs and wants his father home. Over the past 27 years my mom, sisters, and I have had to deal with this. Our children have now had to as well.

If my father is released, he will be living with my oldest sister and her family. I own a business (a cellular phone repair store) and fully expect to be able to employ my father once he is released. Our family is committed to help him get established once again if he is released. He will also contribute to our families by assisting with childcare of his grandchildren and generally helping with family responsibilities.

I am respectfully requesting that you please let my father come home so his family finally has him at home where he belongs. He has served his time and my only fear is that his grandchildren will not have a chance to see the greatness my father has to offer. We have been waiting for this for almost 3 decades now and just hope the end is near. Thank you for taking time to read my letter and hopefully this helps you to see that my father is the type of person that should be home with his family. Please send our Papa home!!! Thank you for your time.

Sincerely,

Ricardo D Seresi

A handwritten signature in black ink, appearing to be 'R D Seresi', written over a light blue horizontal line.

November 13, 2016

Dear President Obama,

My name is Maria T. Seresi and I am the wife of Juan Carlos Seresi. We have been married for 44 years. I am writing this letter to ask for clemency on his behalf. I ask this not only for his life, but for the life of his family who loves him dearly.

He has three grown children and ten grandchildren who love him very much and want him to be able to be a part of their lives. The fact that after all these years his family has not given up on him and still endures great suffering over this situation speaks volumes on his behalf and the type of person he is. He is a decent man, who never had anything on his record before this situation happened. There was no violence, drugs, or weapons involved in his case. The day that he was sentenced, his entire family was sentenced along with him.

I think that he has more than paid for his mistakes. He deserves to be able to enjoy what's left of his life with his family. He has missed all the family events you can imagine- his children's weddings, births of his grandchildren, graduations, family weddings and celebrations. Not only have his children suffered but now his grandchildren feel the loss of their grandfather not being physically in their lives.

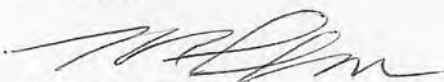
What happened to him and our family has been like a wound that never healed and it will not heal until this is over. The impact this situation had on my life was catastrophic. The pain I felt watching our children suffer is something that I can't put into words.

Juan Carlos is not a career criminal and will never do anything to break the law if he is released. All he wants is to be able to spend time with his family. He is 69 years old and wants to enjoy whatever time he has left with his kids, grandchildren, and his extended family who are waiting for him. He wants to try to make up for lost time the best he can. If he is released, he will be living with our oldest daughter and working for our son who owns his a business. He will be very involved in helping take care of his grandchildren.

His sentence was such an injustice that still leaves us perplexed. Why was there such a discrepancy in his sentence and the sentences imposed by Judge Consuelo Marshall? Why was the fact that Juan Carlos turned himself in never taken into consideration? What about the fact that he had no prior record? I suppose those are issues of the past but things that still haunt us today.

I am asking that you please grant Juan Carlos clemency in this matter. If not just for his sake, but also for the sake of his family who is ready to support him in all ways possible to put an end to this situation. We hope that our prayers will be answered in the form of his freedom.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maria T. Seresi', with a stylized, flowing script.

Maria T. Seresi

PS I have attached a childhood essay that my daughter Patricia wrote. I have kept it all these years even though it is so heartbreaking for me to read it. It has always demonstrated the pain that my children felt and continue to feel about their father. Hopefully, they can begin to feel joy again with his release.

will be okay makes me keep pushing myself to not give up. She has-been been strong when everyone thought she would crumble. She has become strong for us for we depend on her for everything. My mother motivates us all to believe and good things will happen.

~~If there is a Santa Clause out there, may he hear my wish for it is only one.~~

I don't know if I believe in Santa Clause. Is he make believe or is he real? He's probably a figment of imagination. But ~~why does someo~~ **HOW CAN** one who doesn't exist have so many followers? Is his power so great that at this special time of year he spreads good cheer throughout the land? I guess it 's all a matter of opinion. But if there is a Santa Clause out there may he hear my wish for it is only one. Bring daddy home.

**Santa
Please bring
my
daddy
home.**

people fill the streets.

MISSION HILLS, California
 EVIL EYES ENTERPRISES
 Bishop Alemany High School
 Bishop Alemany High School

Every where you look you see the Xmas spirit. There are christmas trees everywhere you look. Heavenly angels adorn every light pole. The streets are filled with happy people as they purchase their gifts. Yes it is Christmas time once again. This is everyone's favorite time of the year. The malls are jammed packed and yet you don't quite mind walking through the mobs of people all there for the same reason you are. There are Santas on every street corner greeting everyone as they stroll by. It is a time to share with your family and cherish the precious moments you share during the holiday season.

Christmas is the most memorable time of the year for people of all ages. I think everyone has certain can think of just one at least one Christmas which has been special to them for one reason or another, good or bad. I remember the when I was seven I. I remember when I was seven Christmas meant only one thing to me gifts, gifts, and more gifts. I wanted to get everyone I knew a Christmas gift because I was sure I would get one in return. My mother sent me off to pick and save with five dollars in my hand and I thought I was on top of the world. (This theory of "Give and you shall receive" ended quickly when I didn't receive as many gifts as I thought I would.)

Yet I remember when I spent Christmas in the hospital was

I don't really remember when I discovered there was no Santa Clause. I must have been about nine. I never really wanted to believe it and I always told my friends "There is a Santa, I swear".
 Therefore,

November 13, 2016

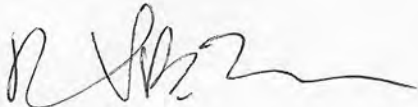
Dear President Obama,

My name is Daniel Mawer and Juan Carlos Seresi is my father-in-law. I am married to his eldest daughter, Patricia Seresi Mawer. I have been a part of his family since about Nov. 1991. I have only known him while he has been incarcerated and I have witnessed throughout the years the type of relationship he has with his family. I can tell you that I have been around long enough to see how much his children and grandchildren love him. I have never heard anything but great things from his children, nieces, and nephews about their childhood. They all have great stories of how loving and fun he was to be around.

Being married to his eldest daughter has brought about its challenges. I have experienced with her the ups and downs of her father being incarcerated. You can only imagine the stress of living with this weight on your shoulders and the issues that it presents not only for my wife but for me also. They talk almost every night on the phone and she visits him whenever possible. I have never stood in the way of her continuing their relationship during these terrible times. I have seen how this has caused times of difficulty in her family. I have seen the depression that my wife and her family have gone through while dealing with their father being incarcerated. I have been a part of the times when moves have had to happen, money has been short, and have seen the difficulty of just having a father physically unable to be around. I have seen the effects on their family while Juan Carlos has been incarcerated.

But, I also see how much love and hope his family has for him. My wife has always shown her unconditional love for him. He talks to his children and grandchildren on the phone almost every night. During visits I see the strong bond he still has with his children and now his grandchildren. If he is released, he will be welcome to live in our home. I know that he will be a contributing member of the family by helping with childcare and household responsibilities. We would be so happy to have him live with us as he begins his life again. I would love to see that father-daughter bond grow between my wife and her father as she has imagined. I would also love to see my relationship and my son's relationship grow with his grandfather. It would be amazing to see this family back together again and to move forward and leave this chapter in our lives behind us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Mawer', with a long horizontal flourish extending to the right.

Daniel Mawer

November 13, 2016

Dear President Obama,

My name is Cristina Stein and I am the middle child of Juan Carlos Seresi. I've been trying to figure out what to write and where to start. This really shouldn't be so difficult. It's practically my whole life that I am writing about. I was eleven years old when this occurred and it completely flipped my world upside down! Prior to this, our family was perfect, at least in my eyes. My parents got along great, they were always there for us, we never wanted for anything, we spoke two languages, attended a Spanish school on Saturdays, we played sports, we got good grades, enjoyed family vacations and loved spending Sunday in the pool while Dad was grilling on the BBQ. We could count on everything being exactly the way it was supposed to be, until it wasn't!

When all of this occurred 27 years ago, it completely devastated our family. We were a very close family that spent an incredible amount of time together. None of us were ever the same after this happened. Although my sister, my brother and I did our best to be positive and successful members of society, this was a continuous weight we carried around. We are the good people we are today because of the solid foundation that both our parents instilled in us from the time we were born. Growing up in my dad's absence was a huge void- not only for us but now for his grandchildren. They have only had the opportunity to know their Grandfather in a visiting room and through very short phone conversations. But because my Dad has always been such an important figure in our lives we made the very difficult decision to take our children into an environment that we would otherwise never have them in. I don't regret my decision to take them, my children love their Papa very much and want nothing more to have him home and spend real quality time with him.

My dad has missed so much in our lives I wouldn't even know where to start...of course there are all of the holidays, birthdays, graduations, weddings, the births of all his grandchildren. But those things are all big things. He's also missed all the daily things and the small things we all take for granted: having a family meal together, going to church as a family, looking up into the stands at one of your games and seeing both parents looking back, teaching your kids how to drive, attending a father-daughter dance, helping with homework and just being a part of our everyday lives. My dad has always been a great dad, no matter what. He has always been supportive and understanding, encouraging and motivating never forgetting his role as our father.

In the 27 years my Dad has been incarcerated, he has been a model inmate, using his time taking countless classes and earning several degrees and being a role model for other inmates. My dad has long ago paid for what he has done and deserves to come home to his family. He should be able to be a real part of all our lives. He has missed so much but could still be a part of so much, he can't ever get back the time and things he has missed, but to be able to be part of the present and future is priceless.

This changed our lives in a million different ways. But one thing it could not change is the bond we all have. After all these years our family has never lost hope that one day this nightmare would come to an end and we could start to put this all behind us.

Sincerely,

Cristina Stein

A handwritten signature in cursive script, appearing to read 'Cristina Stein', written in dark ink.

November 13, 2016

Dear President Obama,

My name is Shawn Stein. I am writing to you in regards to my father-in-law, Juan Carlos Seresi. I have been married to his daughter, Cristina, for 13 years. We have four children together. I also have three other children, two of which Cristina raised from the ages of six and seven.

When I talk to my father-in-law over the phone about his grandchildren and about how much his own daughter has grown and become a wonderful wife and mother. The joy in his voice is undeniable. He has missed so much time with his children, grandchildren and the entire family, that it would be a true blessing to see this all come to an end.

As a father, it hurts me to see my children miss their grandfather and cry when they have to leave their visit and can't understand why "Papa can't come home with us". I can't imagine the pain he goes through when he has to watch them all leave and he has to stay. Time continues to go by and memories are being made without him. I hope that one day soon he'll be a part of those memories.

Throughout the years I have seen the pain this has caused and the emptiness the family feels without my father-in-law. Too many birthdays, anniversaries, baptisms, weddings and holidays have happened without him. I would love to see an end to this part of all of our lives so that we can move on to happier times together.

Sincerely,


Shawn Stein

November 13, 2016

Dear President Obama,

I am writing this letter on behalf of Juan Carlos Seresi. He is my father-in-law and grandfather ("Papa") to my children. He is such an overall amazing grandfather, father, and man. From the first moment we spoke over the telephone until this very day, he has always been a genuine, kind, and positive man towards me. I have watched and heard him give positive guidance to his son. He has always said to me that I am not just his daughter-in-law, but that he considers me one of his own daughters.

His time away from our family has affected the everyday journeys, obstacles, joys, and stages in our lives. We constantly wish "Papa" was here with us to share in it all. Having our children spend time with him in person or on the telephone are such special moments that we don't take for granted. He constantly makes it a point to stay in contact with us all, be it with weekly visits, daily phone calls, and emails. He is consistent in being a part of all our lives and is always willing to hear us, help us, guide us, and advise us just as most great fathers and grandfathers do.

On weekends when the grandchildren have baseball games, he calls to speak with them about their games. He is constantly telling them how proud he is of them and to make sure they learn and have as much fun as possible. The children look forward to telling and sharing their special moments with him, even if it is over the telephone. I am sure he is just as excited to hear them speak of their accomplishments and achievements.

He and his children have missed so many special occasions, achievements, and accomplishments for so many years now. Our only hope is that the grandchildren, his adult children and their spouses can celebrate in many occasions to come together with him. This man I speak of certainly deserves and belongs at home with his family that needs and loves him so very much. We are a faithful, close, and hopeful family waiting for our "Papa" to come home and enjoy all that life has to offer together.

Sincerely,

A handwritten signature in black ink that reads "Gaby Seresi". The signature is written in a cursive, flowing style.

Gaby Seresi
(Wife of Ricardo D. Seresi)

November 13, 2016

Dear President Obama,

My name is Maria Ester Saini and I am the third sister of Juan Carlos Seresi. Our family consisted of my father, mother, three sisters, and the son (Juan Carlos). We all finished high school in Argentina and had a very happy upbringing with much happiness.

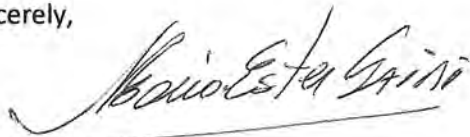
Juan Carlos is a very loved and respected person by everyone. He loves reading and studying. He is a good father, brother, uncle, grandfather, and father. He has so many good qualities but I don't want to focus on that completely. I would like to emphasize in particular one thought: if at any time he took a misstep in his life it was in the circumstances regarding this situation. He is a human being that has paid his price to society for any mistakes he has made.

For this reason, with faith, optimism, and hope I ask for his clemency.

We, as an entire family, are waiting for him to come home so that we may help him readjust to his new life.

With all my heart, these are my wishes.

Sincerely,

A handwritten signature in cursive script, reading "Maria Ester Saini". The signature is written in dark ink and is positioned above a horizontal line.

Maria Ester Saini

[Translated from Spanish to English. Original Spanish version is attached.]

A quien CORRESPONDA:

MI NOMBRE ES MARIA ESTER SAINI, SOY LA TERCER HERMANA DE JUAN CARLOS SERESI.

NUESTRA FAMILIA ESTABA COMPUESTA POR MI PADRE, MADRE, TRES MUJERES Y EL VARON (JUAN CARLOS).

LOS CUATRO CURSAMOS LOS ESTUDIOS SECUNDARIOS TUVIMOS UNA NIÑEZ Y ADOLESCENCIA MUY FELIZ.

JUAN CARLOS ES UNA PERSONA MUY QUERIDA. Y RESPETADA POR TODOS, AMANTE A LA LECTURA, ESTUDIOS, BUEN PADRE, HERMANO, TIO, ABUELO Y AMIGO, SON MUCHAS SUS CUALIDADES, PERO NO DESEO PROFUNDIZAR EN ESO. SOLO QUIERO ENFATIZAR, QUE SI EN ALGUN MOMENTO DE SU VIDA TROPEZO. FUERON LAS CIRCUNSTANCIAS, NADA MÁS. ES UN SER HUMANO, QUE YA PAGÓ SU CUOTA CON LA SOCIEDAD.

POR ESO CON FE, OPTIMISMO Y BUENOS DESEOS PIDO POR SU CLEMENCIA.

AQUI ESTAMOS TODA SU FAMILIA, ESPERANDOLO PARA AYUDARLO A REINCORPORARSE A SU NUEVA VIDA.

CON TODO MI CORAZÓN, SON MIS DESEOS.

Atte:
Maria Ester Saini

November 13, 2016

Dear President Obama,

My name is John Saini. Juan Carlos Seresi is my uncle. My mom (Maria) is Juan Carlos's sister. I am writing this letter with the hopes and dreams of ending a nightmare. When my uncle turned himself in to the authorities I was in the 7th grade. I am now 40 years old, married, college graduate with a degree in Kinesiology and employed by the LAUSD as an Adapted Physical Education teacher. I state these facts to demonstrate the positive support and family waiting for him to come home.

Initially, I planned to describe my deep pain and emotional anguish I battled as young man having no adult male figure to confide in since my father was also arrested. My father has since passed. Instead, I would like to tell you about a man and a family. My uncle is a true family man that is dedicated to his children and family. Growing up, all the kids played Pony League Baseball and Pop Warner Football. He taught me to pitch and field ground balls. When we struggled with school, we were hired tutors (English was a second language for us). Education was very important and a priority. Our families were extremely close and we did everything together: vacations, holidays, birthdays and of course the 4th of July. I remember my uncle and my father telling us that we were "Yankees" and that the 4th was our Independence Day. During those gathering I never saw my uncle intoxicated or sloppy although wine was always on the table. My uncle is a good man (I am sure his record as an inmate will reflect this assertion) that made a mistake and has over paid for any wrongs he has committed to society.

My Uncle's release would close a very dark and exhausting chapter in our family's legacy. Personally, I need to see him free to start the process of healing spiritually and emotionally. Recently, I started imagining and dreaming seeing him free and it gives me hope. I just had my first child- a son born on August 24th of this year- and I would love to share that miracle with my Godfather. I love him and miss him.

Sincerely,

A handwritten signature in black ink that reads "John Saini". The signature is written in a cursive, flowing style.

John Saini

November 13, 2016

Dear President Obama,

My name is Valerie Stein, and I am one of the many grandchildren that Juan Carlos Seresi doesn't have the privilege to see on a daily basis. I am 22 years old and looking back on my childhood I see that my grandfather has missed so many things. It's a given that he has missed out on so many important years of my mother's and my aunt and uncle's lives. To see that he has missed out on my life and my siblings' lives as well is heartbreaking. There are so many birthdays, holidays, weddings, childbirths, family gatherings, and so many more events where we have made countless memories. But on these days, the only experience my grandfather gets is to hear our voices over the phone. As I grow older I understand more about the relationship we have with my grandfather. I now I have four little siblings who don't understand why they can't see their "Papa" every day, when they want to, like they get to see everyone else in the family. I hate to see my younger siblings having to go through so many milestones in their lives without having our grandfather here to see it in person and experience these memories by their side.

My grandfather, Juan Carlos, has missed so many moments in so many lives, but it's not too late for him to be here for the moments he hasn't missed. To see my siblings graduate school, to join in on a family gathering, to experience Thanksgiving and Christmas with the whole family, and to finally be in a family photo instead of seeing pictures without him in them. I hope that one day soon we'll be able to welcome my grandfather home, and get to enjoy the rest of our lives with the family member that has missed too much already.

Sincerely,



Valerie Stein

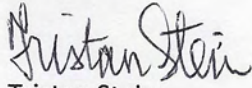
November 13, 2016

Dear President Obama,

My name is Tristan Stein. I am 14 years old and I am the oldest grandson of Juan Carlos Seresi. No matter where my grandfather is, I'm still very grateful to have him. Even though I only get to talk to him over the phone, I can hear the happiness in his voice when he gets to talk to us. Whenever I visit my grandfather I see his eyes light up all the time because we are there to see him.

My younger siblings don't understand yet where we are when we visit and I hope this will all be over before they do and we can spend time with our Papa in a normal way. Every year that goes by we get older and that's another year he misses out on our lives, like a first homerun, and my first day of high school. My grandfather is a special part of my life and all of his grandchildren's lives, and we hope to have him home soon.

Sincerely,


Tristan Stein